

JILL WILLIAMS (SBN 221793)
JOHN J. STUMREITER (SBN 58415)
CARPENTER, ROTHANS & DUMONT
500 South Grand Avenue, 19th Floor
Los Angeles, California 90071
Tel.: (213) 228-0400
Fax: (213) 228-0401
Email: jwilliams@crdlaw.com
jstumreiter@crdlaw.com

Attorneys for Defendant/Respondent
COUNTY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JULIA MILDENBERGER, in her
individual capacity and in her capacity
as CEO of SOUTHERN
CALIFORNIA CAT ADOPTION
TAILS; a California nonprofit
corporation,

Plaintiff/Petitioner,

vs.

COUNTY OF LOS ANGELES; and
DOES 1 through 50, inclusive

Defendants/Respondents.

Case No. _____

**EXHIBITS TO NOTICE OF REMOVAL
VOLUME 1 OF 2 VOLUMES**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Attached hereto are the following exhibits, comprised of documents filed with the state court or emanating from it:

Exh.	Description	Filed	Vol.	Page
A	Petition	12/01/2022	1	3
B	Civil Case Cover Sheet	12/01/2022	1	79
C	Civil Case Cover Sheet Addendum	12/01/2022	1	82
D	Summons	Served 12/06/2022	1	88
E	Request for Judicial Notice	12/01/2022	1	90
F	Notice of Case Assignment	12/01/2022	1	104
G	Notice of Trial Setting Conference	12/01/2022	1	107
H	Ex Parte Application for TRO	12/07/2022	1	109
I	Proof of Personal Service	12/07/2022	2	143
J	Memorandum of Points and Auth.	12/07/2022	2	146
K	Minute Order	12/07/2022	2	186
L	Amended Petition	12/08/2022	2	188
M	Proof of Service by Mail	12/08/2022	2	261

DATED: January 5, 2023

CARPENTER, ROTHANS & DUMONT, LLP

/s/ John J. Stumreiter

By: _____

Jill Williams

John J. Stumreiter

Attorneys for Defendant/Respondent

COUNTY OF LOS ANGELES

Exhibit A

MARLA TAUSCHER, SBN 259630
225 S. Lake Ave., Ste. 300
Pasadena, California 91101
Phone: (626) 345-5777
Fax: (760) 444-2742
e-mail: marla@attymat.com

Attorney for Petitioner/Plaintiff
JULIA MILDENBERGER

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
STANLEY MOSK COURTHOUSE**

JULIA MILDENBERGER, in her individual
capacity and in her capacity as CEO of
SOUTHERN CALIFORNIA CAT
ADOPTION TAILS; a California nonprofit
corporation,

Petitioner/Plaintiff

vs.

COUNTY OF LOS ANGELES; and DOES 1
through 50, inclusive,

Respondents/Defendants

Case No.: 22STCP04242

1. VERIFIED PETITION FOR WRIT OF MANDATE;
2. VIOLATION OF CALIFORNIA CONSTITUTION, ART 1, §§7 & 13;
3. COMPLAINT FOR DAMAGES PURSUANT TO 42 U.S.C. §1983;
4. REQUEST FOR INJUNCTIVE RELIEF PURSUANT TO CCP §526

[Request for Judicial Notice; Declaration of Marla Tauscher; Declaration of Julia Mildenerger; and *Ex Parte* Application for Temporary Restraining Order filed concurrently]

Dept.:
Judge:
Hearing Date:
Hearing Time:

JULIA MILDENBERGER'S PETITION FOR WRIT OF MANDATE AND
COMPLAINT FOR DAMAGES PURSUANT TO 42 U.S.C. §1983

Petitioner/Plaintiff Julia Mildenberger (hereinafter "Petitioner/Plaintiff"), by and through her undersigned counsel, brings this action for a writ of mandate pursuant to *California Code of Civil Procedure* section 1085, *et. seq.*, Violation of California Constitution, Art. 1, sections 7 and 13, Complaint for damages pursuant to 42 U.S.C. §1983, and for injunctive relief pursuant to *California Code of Civil Procedure* section 526, alleging as follows against Respondents/Defendants County of Los Angeles and DOES 1 through 50, inclusive:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over this action pursuant to *California Code of Civil Procedure* §1085; 42 U.S.C. §1983; and California Constitution Article 6 §10.

2. This Court further has jurisdiction over Defendant because the County of Los Angeles is liable for public employees and private contractors pursuant to *California Government Code* §815.2 and 815.4.

3. Venue is proper in this Court pursuant to California Code of Civil Procedure Sections 393 and 394 because Defendants are located in and/or conducting business in the County of Los Angeles, California.

II. PARTIES

4. Petitioner/Plaintiff is, and at all times mentioned herein, residing in Littlerock, Los Angeles County in the State of California.

5. Petitioner/Plaintiff is the founder and CEO of a California nonprofit animal rescue organization with tax exempt status under §501(c)(3) of the Internal Revenue Code.

6. Defendant County of Los Angeles is a political subdivision of the State of California duly organized and existing under the laws of the State of California. Defendant is liable for the conduct of its personnel, including the Los Angeles County Department of Animal Control (hereinafter "LADAC").

7. Defendants DOES 1 to 50, inclusive, are sued herein under fictitious names. Their true names and capacities are not currently known to Petitioner/Plaintiff. When their true names and capacities are ascertained, Petitioner/Plaintiff will amend this complaint by inserting their true names and capacities.

1 8. Petitioner/Plaintiff is informed and believes and herein alleges that each of the
2 fictitiously named defendants is responsible for the harm set forth herein and that
3 Petitioner/Plaintiff's damages as herein alleged were caused by those defendants.

4 9. Petitioner/Plaintiff is informed and believes, and based thereon alleges, that at all
5 times relevant hereto, each of the Respondents was the agent, servant, representative, joint
6 venturer or employee of each of the remaining Respondents and in doing the things hereinafter
7 alleged, each Respondent was acting within the course and scope of said agency, servitude,
8 representation, joint venture, or employment, with the advance knowledge, permission, consent,
9 acquiescence, authorization, direction or subsequent ratification of each and every remaining
10 Respondent.

11 **III. PETITIONER/PLAINTIFF HAS A BENEFICIAL INTEREST IN THE**
12 **ANIMALS THAT ARE THE SUBJECT OF THIS LITIGATION**

13 10. Petitioner/Plaintiff has a beneficial interest in the animals that were seized from
14 her property on October 26, 2022 as the CEO of a rescue organization that maintains the animals.

15 **IV. STATEMENT OF THE CASE**

16 10. Petitioner/Plaintiff runs a non-profit animal rescue called Southern California Cat
17 Adoption Tails (hereinafter "SCCAT") from her property in Littlerock, California.

18 11. Petitioner/Plaintiff has saved the lives of thousands of cats, kittens, and dogs since
19 the rescue's inception in 2006.

20 12. Petitioner/Plaintiff has held animal facility licenses (hereinafter "kennel
21 permits") for both cats and dogs issued by LADAC since 2011 when she moved to Littlerock,
22 California. Attached hereto as Exhibit 1 are true and correct copies of the kennel permits issued
23 by LADAC in September 2021 valid through September 2, 2022.

24 13. Petitioner/Plaintiff has several volunteers who help her to feed the animals, clean
25 the facilities, and provide care and comfort for the rescue animals on a daily basis.

26 14. Per the terms of the kennel permits, Petitioner/Plaintiff is allowed to house 115
27 cats and 30 dogs on her property.

1 15. Petitioner/Plaintiff's property is inspected by LADAC every year as a condition
2 of renewal of the kennel permit.

3 16. Every year, Petitioner/Plaintiff has received a grade of "A" based on inspections
4 by LADAC personnel. Attached hereto as Exhibit 2 are true and correct copies of the inspection
5 reports, from 2016-2022, indicating Petitioner/Plaintiff's "A" rating from LADAC personnel.
6 The inspection reports from previous years are missing and were likely taken by LADAC in their
7 "box of Misc. documents".

8 17. Since the beginning of the COVID-19 pandemic, in approximately March 2020,
9 LADAC (and many other Southern California animal control agencies, including Los Angeles
10 Animal Services – City animal control) have refused to take in cats or kittens despite the fact
11 that taking in abandoned and stray animals is quite literally *their job*.

12 18. Since early 2020, LADAC personnel have routinely been telling animal rescue
13 organizations and individuals to just dump stray and abandoned animals where they found them,
14 on the streets, in fields, or somewhere else.

15 19. As a result of LADAC's unofficial policy of refusing to take in animals,
16 Petitioner/Plaintiff has had litters of kittens and puppies dumped just outside the gate of her
17 facility for over two years.

18 20. In just the six weeks leading up to the raid on her property alone, 5 or 6 litters of
19 kittens (about 30 kittens in total) were dumped outside Petitioner/Plaintiff's property.

20 21. Similarly, a litter of 8 puppies was abandoned just outside Petitioner/Plaintiff's
21 gate a week before the raid on October 26, 2022. Was Petitioner/Plaintiff supposed to turn her
22 back on those kittens and puppies and abandon them to fend for themselves in the high desert?

23 22. In mid-August 2022, Petitioner/Plaintiff submitted the required paperwork and
24 payment for the renewal of her kennel permit which was set to expire on September 2, 2022 and
25 has been waiting for LADAC to conduct its annual inspection.

26 23. To that end, on October 18, 2022, Petitioner/Plaintiff's counsel contacted
27 LADAC personnel in charge of licensing, Lisa Eldridge (hereinafter "Eldridge") to inquire about
28 the status of the inspection.

1 24. Eldridge responded to counsel that day by falsely stating, "...our business license
2 inspectors are backlogged and *we don't anticipate being out for several weeks.*" Attached
3 hereto as Exhibit 3 is a true and correct copy of the October 18, 2022 email exchange between
4 Eldridge and Petitioner/Plaintiff's counsel.

5 25. At the time she responded, Eldridge had no intention of conducting an inspection
6 and was already well into the planning of her raid on Petitioner/Plaintiff's property a week later.

7 26. Instead of conducting an inspection, Eldridge showed up at Petitioner/Plaintiff's
8 property early on the morning of October 26, 2022 with approximately 12 LADAC personnel
9 and an additional 12 Los Angeles County Sheriff Department deputies (hereinafter "LASD").

10 27. Petitioner/Plaintiff had taken several cats to the LADAC Palmdale facility early
11 on the morning of October 26, 2022 to have them spayed and neutered.

12 28. When she arrived home, after entering the property, Petitioner/Plaintiff went to
13 close the gates to the property and was accosted by a dozen LASD personnel in full riot gear
14 with guns drawn – for a raid on a cat rescue!

15 29. LADAC personnel who take part in such raids are, at least theoretically, qualified
16 to serve search warrants and make arrests without law enforcement personnel if they have taken
17 the required courses under *California Penal Code* §832 (hereinafter "PC"), but they routinely
18 bring in police for theater.

19 30. There are no allegations in the search warrant of potential violence, dangerous
20 suspects, weapons, drugs, or anything that would necessitate an armed response by police in full
21 riot gear.

22 31. LASD deputies' role during the raid appears to have been to intimidate
23 Petitioner/Plaintiff and to provide dramatic effect.

24 32. LASD deputies ordered Petitioner/Plaintiff to exit the property, held her hands
25 behind her back, and locked her in the back seat of a Sheriff car for more than an hour and a half,
26 while refusing to tell Petitioner/Plaintiff why they were there.

27 33. Petitioner/Plaintiff's granddaughter, Angel, was similarly locked in a different
28 LASD vehicle, for nearly two hours.

1 34. During the raid, another of the volunteers who helps care for the rescue animals
2 overheard some LASD deputies quite happily discussing the fact that they were being paid time
3 and a half to participate in the LADAC raid, despite the fact that they were primarily present for
4 intimidation not function.

5 35. LASD deputies stood around, watching, while LADAC personnel ransacked the
6 animal kennel areas, outbuildings, and Petitioner/Plaintiff's residence, removing animals and
7 whatever else they decided to take.

8 36. Only when Petitioner/Plaintiff was released from the sheriff car, was she told that
9 the reason they were there was to seize all of the animals on the property.

10 37. Petitioner/Plaintiff was not informed of the existence of a search warrant until
11 LADAC and LASD personnel were leaving her property, at approximately 4:00 p.m., when
12 someone handed Petitioner/Plaintiff a copy of the search warrant – without the
13 statement/affidavit of probable cause – as they were exiting her property. Attached hereto as
14 Exhibit 4 is a true and correct copy of the search warrant as it was provided to Petitioner/Plaintiff
15 *after* LADAC had removed the animals from her property.

16 38. According to a list of items scrawled on a piece of paper and appended to the end
17 of the search warrant, LADAC seized *approximately* 199 live cats, *approximately* 35 dogs, 2
18 tortoises, 1 chinchilla, and *approximately* 7 animal carcasses that had been placed in a freezer
19 pending proper disposal. The list also included 1 box of miscellaneous paperwork. In other
20 words, LADAC does not know what it seized.

21 39. Had anyone bothered to ask Petitioner/Plaintiff about the deceased animals in the
22 freezer, they would have learned that one animal was going to be taken to a lab for a necropsy,
23 two of them were going to be taken for cremation, one was a stillborn puppy, one was a feral
24 kitten that died shortly after birth and the other was a very old hamster that was being cared for
25 by Petitioner/Plaintiff for a friend who has terminal cancer.

26 40. But, no one asked Petitioner/Plaintiff about those animals because the truth does
27 not support LADAC's narrative or the raid on Petitioner/Plaintiff's property.
28

1 41. Among the animals seized were 3 kittens who are very sick and were under
2 veterinary care at a cost of over \$2,000 for each kitten to date.

3 42. Those kittens require medication that is very expensive and is very difficult to
4 source.

5 43. Furthermore, those kittens had already been adopted by third parties and must be
6 given to their new owners without delay.

7 44. Since seizing Petitioner/Plaintiff's animals, LADAC has ignored all of the
8 statutory requirements that govern such endeavors, namely several provisions of *California*
9 *Penal Code (hereinafter "PC") §597.1*, which governs the seizure of animals in cases of
10 suspected neglect/abuse.

11 45. *PC §597.1* is a complex statute, with 13 subsections, many of which are intended
12 to safeguard animal owners' Constitutional right to due process.

13 46. Petitioner/Plaintiff was not arrested and no charges have been filed against her.

14 47. According to a press release issued by LADAC on Monday, October 31, 2022,
15 LADAC has admitted that it had no justification to seek a search warrant, especially where the
16 affiant claimed that there is evidence that "tends to show that a felony has been committed".
17 Attached hereto as Exhibit 5 is a true and correct copy of the press release issued and sent by
18 email to hundreds, if not thousands, of people, including media.

19 48. If LADAC personnel had even a basic understanding of the laws they are paid to
20 enforce, they would know that the allegations in their press release, if proven, are misdemeanors
21 – not felonies or do not constitute crimes at all.

22 49. For example, in the press release, LADAC alleged "failure to provide proper
23 medical care for animals." That is an allegation of animal neglect which, if proven, would be a
24 violation of *PC §597.1*, which is a *misdemeanor*, by statute.

25 50. LADAC further claims that they found evidence of the practice of veterinary
26 medicine without a license.

27 51. However, there is no law that prohibits a person from treating their own animals.
28 *California Business and Professions Code §4827* provides, in relevant part:

1 “(a) Nothing in this chapter prohibits any person from:

2 (1) Practicing veterinary medicine as a bona fide owner of one’s animals.

3 This exemption applies to the following:

4 A. The owner’s bona fide employees;

5 B. Any person assisting the owner, provided that the practice is performed
6 gratuitously.” See Petitioner/Plaintiff’s Request for Judicial Notice.

7 52. In short, *treating one’s own animals is not a crime*.

8 53. LADAC personnel should at least be aware of the laws they are paid to enforce,
9 but clearly, they are not.

10 54. If LADAC personnel did know the applicable laws, they would also know that
11 they could not possibly have had a good faith belief that Petitioner/Plaintiff had engaged in
12 behavior that could be charged as a felony.

13 **V. DUE PROCESS AND CALIFORNIA LAW REQUIRE A HEARING**
14 **PRIOR TO THE SEIZURE OF PROPERTY (INCLUDING ANIMALS) BY THE**
15 **GOVERNMENT**

16 55. Where a person’s property is taken by the government, the due process clause of
17 the Fourteenth Amendment requires some form of notice and a hearing. *Beaudreau v. Superior*
18 *Court (1975) 14 Cal.3d 448, 458; Mathews v. Eldridge (1976) 424 U.S. 319.*

19 56. “Absent extraordinary circumstances justifying resort to summary procedures, the
20 hearing must take place *before* the property is taken.” As explained in *Fuentes v. Shevin (1972)*
21 *407 U.S. 67, 81-82.* “If the right to notice and a hearing is to serve its full purpose, then, it is
22 clear that it must be granted at a time when the deprivation can still be prevented.” In other
23 words, before the deprivation of property.

24 57. Indeed, *California Penal Code §597.1, the only statute that provides for the*
25 *seizure of the animals in this case*, sets forth specific procedures for hearings related to the
26 seizure of animals in cases of suspected neglect.

27 58. PC §597.1 contains pre- and post-seizure hearing provisions in subsections (f)
28 and (g) that were added to PC §597.1 in 1990 by AB35, which recognized the need for *due*

1 *process* with respect to the seizure of animals. Attached hereto as Exhibit 6 is a true and correct
 2 copy of the relevant portion of the Legislative History of AB35. *See* also Petitioner/Plaintiff's
 3 Request for Judicial Notice.

4 59. Subsection (g) requires a *pre-seizure hearing* where there is no need for an
 5 immediate seizure of animals.

6 60. LADAC made no attempt whatsoever to comply with the pre-seizure hearing
 7 requirements of *PC §597.1*, because they were intent on seizing animals regardless of the facts.

8 61. *PC §597.1(f)* permits the seizure of animals prior to a hearing only where there is
 9 a "reasonable belief that prompt action is required to protect the health or safety of the animal or
 10 the health or safety of others."

11 62. There are no facts cited in the search warrant that could have led to a reasonable
 12 belief that an immediate seizure of the animals was necessary or justified.

13 63. Interestingly, there are no facts alleged in the subsequent press release issued by
 14 LADAC that would constitute exigent circumstances.

15 64. *PC §597.1(f)* sets forth the requirements and procedures for a "*post-seizure*
 16 *hearing to determine the validity of the seizure or the impoundment or both*", all of which have
 17 been ignored by LADAC. *See* Petitioner/Plaintiff's Request for Judicial Notice.

18 65. The seizing agency is required to post or personally serve the owner or
 19 custodian of the animals with notice that he/she is entitled to a hearing to challenge the validity
 20 of the seizure or impoundment.

21 66. That notice is required to be personally served or posted at the property from
 22 which the animals were seized within 48 hours of the seizure, excluding weekends and holidays.
 23 *PC §597.1(f)(1)*.

24 67. In this case, LADAC was required to post notice of the seizure and
 25 Petitioner/Plaintiff's right to a post-seizure hearing by end of day Friday, October 28, 2022.

26 68. As of this writing, 9 days after the seizure of the animals, LADAC has failed to
 27 post notice of a post-seizure hearing, in violation of State law and Petitioner/Plaintiff's
 28 Constitutional right to due process.

69. LADAC has also failed to provide any information about the disposition of the animals and LADAC's fees for holding the animals, among other things, despite written requests from Petitioner/Plaintiff's counsel.

VI. THERE WERE NO EXIGENT CIRCUMSTANCES CITED THAT WOULD JUSTIFY SEIZURE OF ANIMALS WITHOUT A PRE-SEIZURE HEARING

70. There is very little published, citable case law related to *PC §597.1*. However, there is one case that sets the standard for seizure of animals without a *pre-seizure hearing*.

71. The language of *PC §597.1* that authorizes animal control to immediately seize animals, without a pre-seizure hearing, "is the equivalent of the exigent circumstances exception familiar to search and seizure law." *Broden v. Marin Humane Society* (1999) 70 Cal. App. 4th 1212, 1220-1221.

72. In *Broden*, the owner of an exotic pet shop had abandoned the store and left the animals inside. After getting a report of a very strong odor emanating from the pet store, an employee of Marin Humane Society (hereinafter "MHS") went to the store.

73. From outside the store, the MHS employee smelled the stench of rotting animal carcasses.

74. The doors were locked and the blinds were closed, but she could see a lot of flies inside the store and flies trying to get into the store.

75. She tried multiple times to contact the store owner, Steve Broden, on three different phone numbers, but got no answer.

76. The court reasoned that MHS's entry and seizure of animals, without a pre-seizure hearing, was warranted based on the overwhelming smell of decaying dead animals.

77. The facts of this case are nothing like those in *Broden*. In fact, Petitioner/Plaintiff has received an "A" grade every year from LADAC's own inspectors.

78. LADAC did not cite any facts or evidence in the search warrant that constitute *exigent circumstances* such that convening a pre-seizure hearing would have caused harm to any of the animals.

1 79. Even after the raid, LADAC has not cited any facts or evidence, in their press
2 release, that would rise to the level of *exigent circumstances*.

3 80. Had LADAC personnel been sufficiently familiar with applicable laws, they
4 would have known that the proper procedure, *in the absence of exigent circumstances* is that
5 which is outlined in *PC §597.1(g)*:

6 “Where the *need for immediate seizure is not present* and before
7 the commencement of any criminal proceedings authorized by this
8 section, the agency shall provide the owner or keeper of the animal,
9 if known or ascertainable after reasonable investigation, with the
10 *opportunity for a hearing before any seizure or impoundment of*
11 *the animal*. The owner shall produce the animal at the time of the
12 hearing unless, before the hearing, the owner has made
13 arrangements with the agency to view the animal upon request of
14 the agency, or unless the owner can provide verification that the
15 animal was humanely euthanized.” [emphasis added].

16 81. Pursuant to the pre-seizure notice and hearing requirements, if LADAC personnel
17 had credible evidence of animal neglect, they were required to post notice at Petitioner/Plaintiff's
18 property or personally serve her with notice that she was entitled to a hearing prior to the seizure
19 of the animals at which Petitioner/Plaintiff could have brought in the animals in question and/or
20 records or other evidence to show that the animals were not in fact neglected.

21 82. A pre-seizure hearing would have been convened within 48 hours of the request
22 for such a hearing. *PC §597.1(g)(2)*.

23 83. As such, unless LADAC had evidence, *before the seizure of the animals* that
24 there were animals in imminent danger of dying, and that would have been dead or seriously
25 harmed if they had waited 48 hours and held a pre-seizure hearing, there were no exigent
26 circumstances that would justify the seizure of animals without a pre-seizure hearing.

27 **VII. A SEARCH WARRANT IS NOT A SUBSTITUTE FOR DUE PROCESS**
28 **AND DOES NOT NEGATE THE PRE-SEIZURE OR POST-SEIZURE HEARING**
 REQUIREMENTS UNDER PC 597.1

84. There is a common misconception among animal control personnel and their attorneys that where animals are seized pursuant to a search warrant, they are not required to convene a pre-seizure hearing.

85. There is nothing in *PC §597.1* that supports that contention. That position appears to be a misinterpretation of the law or just plain wishful thinking.

86. The purpose of a pre-seizure hearing is to provide the animal owner notice of the allegations and an opportunity to be heard prior to the deprivation of their property (animals) by a government entity.

87. Seizing animals, without a pre-seizure hearing does not provide an opportunity to be heard, which is expressly provided for in *PC §597.1(g)*.

88. A post-seizure hearing is the only opportunity for animal owners to challenge the validity of the seizure of their animals prior to the filing of criminal charges.

89. Animal control agencies routinely wait months to file criminal charges, while arbitrarily assessing outrageous fees, and demanding payment of those fees as a condition of maintaining ownership of the seized animals.

90. Allowing animal control agencies to do an end-run around justice by obtaining a search warrant, while ignoring statutory safeguards, frustrates the purpose of the due process clauses of the California and United States Constitutions.

VIII. LADAC HAS IGNORED ALL APPLICABLE LAW AND HAS FAILED TO PROVIDE FOR A POST-SEIZURE HEARING AS *REQUIRED* BY STATUTE

91. LADAC is completely ignoring applicable law in this case. Even if LADAC personnel believed they were justified in seizing the animals without a pre-seizure hearing, there is still a *requirement* of a post-seizure hearing. *PC §597.1(f)*.

92. LADAC was required to either personally serve Petitioner/Plaintiff, or post at her property, within 48 hours of the seizure, a notice of her right to a post-seizure hearing. *PC §597.1(f)(1)*.

93. Petitioner/Plaintiff would have 10 days from receipt of the notice to request a hearing, which is required to be convened within 48 hours of receiving the request for a hearing.

1 94. LADAC has done none of those things. As of this writing, 9 days after the
2 seizure, LADAC has not served notice of a post-seizure hearing on Petitioner/Plaintiff or her
3 counsel.

4 **IX. LADAC HAS FORFEITED ITS ONLY OPPORTUNITY TO DEEM THE**
5 **SEIZURE OF PETITIONER/PLAINTIFF'S ANIMALS VALID AND CANNOT**
6 **IMPOSE FEES FOR THE SEIZURE OR IMPOUNDMENT OF THE ANIMALS**

7 95. The purpose of a post-seizure hearing is explicitly set forth in *PC§597.1(f)*, “to
8 *determine the validity of the seizure* or impoundment, or both.”

9 96. Because LADAC has failed to adhere to any of the requirements of the law
10 governing the seizure of animals, it has forfeited jurisdiction and its only opportunity to deem
11 its seizure of the animals valid and to charge fees for impoundment or storage of the animals.

12 97. Pursuant to *PC §597.1(f)(2)*, “Failure of the owner or keeper, or of their agent, to
13 request or to attend a scheduled hearing shall result in a forfeiture of any right to a postseizure
14 [sic] hearing or right to challenge their liability for costs incurred.”

15 98. If an animal owner forfeits his or her right to a post-seizure hearing by failing to
16 request a hearing, it stands to reason that an animal control agency’s right to deem an animal
17 seizure valid is forfeited when it fails to even mention a post-seizure hearing much less convene
18 one.

19 99. Similarly, if an animal owner who fails to request a post-seizure hearing forfeits
20 the right to contest the amount of fees imposed, an animal control agency must be prevented
21 from imposing fees at all, where it has forfeited its one and only opportunity to deem the seizure
22 valid by ignoring all applicable law.

23 100. “The agency, department, or society employing the person who directed the
24 seizure shall be responsible for the costs incurred for caring and treating the animal, if it is
25 determined in the postseizure [sic] hearing that the seizing officer did not have reasonable
26 grounds to believe very prompt action, including seizure of the animal, was required to protect
27 the health or safety of the animal or the health or safety of others.”
28

1 101. Where there was no post-seizure hearing at all, LADAC has no legal grounds for
2 assessing fees against Petitioner/Plaintiff for the impoundment or storage of her animals.

3 **X. REVENUE, NOT JUSTICE, COMPELS LADAC TO KEEP THE**
4 **ANIMALS AS THEY CHARGE SUBSTANTIAL DAILY IMPOUND FEES FOR EACH**
5 **ANIMAL**

6 102. The daily “boarding” rate that LADAC charges for impounded animals is
7 unknown because they refuse to answer a direct question about their fees, despite the fact that
8 such information should be readily available to them given that they have been seizing and
9 impounding animals for decades.

10 103. The daily “boarding” rates charged by animal control agencies in such cases vary,
11 but are typically in the range of \$30-50 per day per dog.

12 104. Those rates are arbitrary and capricious and are completely unrelated to the actual
13 cost of care of the animals.

14 105. It is more likely than not that LADAC will similarly cite extortionate rates for
15 “boarding”.

16 106. As a matter of basic fairness, *to avoid the incurrence of unnecessary expenses*
17 animal owners and custodians are *entitled to a hearing before their animals are seized or*, if the
18 circumstances justify a seizure without notice and a hearing, they are entitled to a prompt hearing
19 after the animals are seized. *Carrera v. Bertaini* (1976) 63 Cal. App. 3rd 721, 729.

20 107. The whole point of adding pre- and post-seizure hearing provisions to *PC §597.1*
21 in 1990 was to provide an opportunity for due process, something for which LADAC has no
22 regard.

23 108. In fact, LADAC appears to be more interested in profiting from the continued
24 impound of the dogs and bragging about it publicly than in complying with laws that prohibit
25 them from doing just that. LADAC will charge daily rates over and above their actual costs.

26 109. They will also likely tack on ridiculous, arbitrary, charges for veterinary exams
27 and staff time despite the fact that LADAC employs its own veterinarians in-house and staff is
28 present whether these animals are impounded or not.

110. LADAC has a powerful profit motive for disregarding the provisions of *PC §597.1* that require them to respect the due process rights of animal owners and custodians.

111. The longer LADAC holds the animals, the more money they will charge Petitioner/Plaintiff, *without any opportunity to contest the amount they demand for impound and "boarding" fees.*

112. Permitting LADAC to retain custody of animals for profit does not serve justice nor does it serve any legal purpose as the dogs are of zero evidentiary value. It only serves to enrich the County of Los Angeles at the expense of Petitioner/Plaintiff.

113. Allowing LADAC to retain custody of the animals they seized has additional deadly consequences for other animals.

114. Because the seized animals are taking up space at LADAC facilities, other dogs and cats that are impounded, or were previously impounded, will be killed due to a lack of kennel space.

XI. THE AFFIANT COULD NOT HAVE HAD A GOOD FAITH BELIEF THAT ANY ALLEGATIONS IN THE SEARCH WARRANT CONSTITUTE A FELONY

115. There are no allegations of felonious conduct in the search warrant.

116. In its October 31, 2022 press release, bragging about the raid, LADAC claims that Petitioner/Plaintiff's rescue organization failed to provide proper medical care of the animals and exceeded animal limitation requirements.

117. The animal neglect issue has been discussed at length here and is, by statute, a *misdemeanor*, subject to proof at trial.

118. As far as whether Petitioner/Plaintiff was "exceeding animal limits", that is related to the kennel permits that Petitioner/Plaintiff has for 115 cats and 30 dogs and is not even criminal, much less felonious.

119. Issues related to alleged violations of licenses and permits are strictly administrative, not criminal.

120. In fact, on March 23, 2022, a LADAC employee, Tony Apodaca (hereinafter "Apodaca") issued a *Notice to Comply* to Petitioner/Plaintiff, in which he ordered her to reduce

1 the number of cats on her property from 115 to 75 within a month, without any citation to law
2 or any reason.

3 121. In keeping with LADAC employees' ignorance of the law and procedures,
4 particularly those related to due process, Apodaca disregarded the entire *administrative* process
5 for amending permits already issued by LADAC.

6 122. In response to that *Notice to Comply*, Petitioner/Plaintiff's counsel contacted Lisa
7 Eldridge (hereinafter "Eldridge"), Apodaca's boss, to inform her that LADAC could not
8 arbitrarily order Petitioner/Plaintiff to do reduce the number of cats, which is a modification of
9 her kennel permit, without an administrative hearing.

10 123. A meeting was convened with Eldridge, a member of LADAC administration,
11 Petitioner/Plaintiff, and her counsel, on April 26, 2022, during which Eldridge was forced to
12 concede that LADAC could not modify Petitioner/Plaintiff's permit without a hearing and the
13 order to reduce the number of cats was subsequently vacated. Attached hereto as Exhibit 7 is a
14 true and correct copy of a May 3, 2022 email exchange between Eldridge and
15 Petitioner/Plaintiff's counsel confirming that the order to reduce the number was vacated.

16 124. The raid on Petitioner/Plaintiff's property appears to be motivated, at least in part,
17 by a personal grudge held by Eldridge because she could not get away with arbitrary and
18 capricious orders for Petitioner/Plaintiff to reduce the number of cats at her facility.

19 125. Common sense dictates that a violation of a permit law would not constitute a
20 felony.

21 126. Most jurisdictions have administrative procedures for matters related to permits.

22 127. Had anyone from LADAC bothered to spend five minutes on the internet, they
23 could have easily found the applicable laws, but they would have found that they were not
24 entitled to get a search warrant or to seize Petitioner/Plaintiff's animals under the circumstances.

XII. ANIMALS CANNOT TESTIFY AND ARE NOT EVIDENCE OR WITNESSES

128. "Evidence" is defined as testimony, writings, material objects, or other things presented to the senses that are offered to prove the existence or nonexistence of a fact." *California Evidence Code §140.*

129. What possible value could these animals have as evidence? The animals themselves are not evidence of anything other than the fact that they exist.

130. If the allegation is that Petitioner/Plaintiff was not providing care for the animals, beyond examining the animals and recording information about the animals and documents that were seized, there is nothing the animals themselves can add to that evidence.

131. If LADAC alleges that the animals were mistreated by Petitioner/Plaintiff, the animals should have immediately been examined by a licensed veterinarian.

132. The results of a veterinary exam may constitute evidence, but the animals themselves are of no evidentiary value to LADAC, yet they are being treated like criminals.

133. Dogs and cats cannot appear as witnesses in legal proceedings, and even if they could, our legal system does not allow for the pre-trial detention of potential witnesses, but that is effectively what LADAC is doing.

134. The evidence needed to support claims of animal neglect could have been, and should have been, gathered immediately upon impound.

135. Continued detention of the animals is cruel and inhumane and is not justified by applicable laws. It also has deadly consequences for other animals with the misfortune of ending up at any LADAC facility who will be killed to make space for the seized animals. It is a lose-lose situation for all animals involved.

XIII. THE LAW DOES NOT CONTEMPLATE *PERMANENT* DEPRIVATION OF ANIMALS IN CASES OF ALLEGED NEGLECT NOR DOES IT APPLY TO ANIMALS LIVING ON AN OWNER'S PROPERTY

136. PC §597.1(a)(1) specifically references "stray or abandoned animals". The Legislature has clearly limited the seizure of animals in cases of alleged neglect to those animals that are found *without their owners*:

- Any peace officer, humane society officer, or animal control officer shall take possession of the stray or abandoned animal and shall provide care and treatment for the animal until the animal is deemed to be in suitable condition to be returned to the owner. PC §597.1(a)(1).

137. PC §597.1 further contains multiple provisions that specifically provide for the return of seized animals when the animals are fit to be returned and when the owner demonstrates that he/she can provide the necessary care for her animals:

- Any peace officer, humane society officer, or animal control officer shall take possession of the stray or abandoned animal and shall provide care and treatment for the animal until the animal is deemed to be in suitable condition to be returned to the owner. PC §597.1(a)(1);
- The animal shall not be returned to its owner until the charges are paid and the owner demonstrates to the satisfaction of the seizing agency or the hearing officer that the owner can and will provide the necessary care for the animal. PC §597.1(f)(4).
- If the charges are not paid within 14 days of the seizure, or if the owner, within 14 days of notice of availability of the animal to be returned, fails to pay charges permitted under this section and take possession of the animal, the animal shall be deemed to have been abandoned and may be disposed of by the seizing agency PC §597.1(h);
- If the animal requires veterinary care and the humane society or public agency is not assured, within 14 days of the seizure of the animal, that the owner will provide the necessary care, the animals shall not be returned to its owner. PC §597.1(i);

- No animal properly seized under this section or pursuant to a search warrant shall be returned to its owner until the owner can demonstrate to the satisfaction of the seizing agency or hearing officer that the owner can and will provide the necessary care for the animal. *PC §597.1(j)*.

138. LADAC has not even provided notices or hearings as required by law, nor have they provided basic information about the disposition of the animals or the amount of money they intend to charge Petitioner/Plaintiff, much less any indication of when the animals will be available for return to Petitioner/Plaintiff.

139. It is more likely than not that LADAC personnel are not even aware of the provisions of *PC §597.1* that clearly provide for the return of animals to their owners when they are deemed suitable for return.

140. Despite the fact that the law clearly contemplates return of animals to their owners, many animal control agencies have adopted an unofficial, and unlawful, practice of extorting money from animal owners by demanding payment for “boarding” of animals every two weeks.

141. If an owner does not pay whatever amount is demanded, biweekly, without any breakdown of fees, or any indication of what the payment is for, animal control agencies will deem the animals abandoned and either kill them or give them to third parties.

142. There is nothing in the law that permits such a practice, but it is widespread, standard operating procedure, among animal control agencies.

143. Animal owners are forced to pay arbitrary amounts of money for months to maintain their ownership rights in their animals, with no opportunity to contest the dollar amounts.

144. Because animal control agencies have up to a year to file misdemeanor charges against an owner, they often wait months to file charges, if ever, providing themselves an opportunity to extort exorbitant amounts of money from owners who are desperate not to lose ownership of their animals.

1 145. If the due process clauses of the Constitutions of California and the United States,
2 the seizure of these animals must be invalidated and the animals returned to Petitioner/Plaintiff
3 immediately, without payment to LADAC.

4 146. Animals four months and younger are not counted for the purposes of animal
5 limits. Approximately 60 of the cats seized were kittens, under the age of four months. At least
6 8 of the seized dogs were puppies that were younger than four months.

7 147. If the number of animals returned exceeds the number of animals permitted by
8 Petitioner/Plaintiff's kennel permits, those animals will be housed with fosters or in boarding
9 facilities until they can be adopted by third parties.

10 **XIV. THE SEARCH WARRANT OBTAINED BY LADAC IS ABSURDLY**
11 **BROAD IN SCOPE**

12 148. Based on the language of the search warrant, it appears that the person who
13 drafted it is entirely unfamiliar with criminal law, specifically the purpose and scope of warrants,
14 and likely cut and pasted the contents of a search warrant from the internet or some other source.
15 See Exhibit 4.

16 149. For example, the search warrant authorizes the seizure of documents and things
17 related to the ownership and maintenance of Petitioner/Plaintiff's real property and her person,
18 including mortgage statements, lease agreements, utility bills, mail, prescription medications,
19 photographs, clothing, government issued IDs (Social Security card and driver's license).

20 150. The search warrant further authorizes the seizure of all computer hardware and
21 electronic equipment, including motherboards, hard drives, laptop computers, digital storage
22 devices, and computer software.

23 151. Also included in the search warrant is a demand for all computer passwords and
24 other "data security devices designed to restrict access to or hide computer software,
25 documentation, or data..."

26 152. Petitioner/Plaintiff operates a nonprofit animal rescue organization, not a Ponzi
27 scheme! There is no justification whatsoever for LADAC to demand such personal and private
28 documentation and other things.

153. There are no allegations of financial misconduct, so there is no reason whatsoever for the inclusion of any financial information or any documentation related the ownership of the real property, computer information, or any of the other things related to money or property other than animals.

FIRST CAUSE OF ACTION/CLAIM FOR RELIEF

Petition for Writ of Mandate

154. Petitioner/Plaintiff repeats, realleges, and incorporates by reference all of the allegations in paragraphs 10 through 153 as if fully set forth herein.

155. Respondents/Defendants have violated *PC §597.1* and California Constitution, Art. 1, sections 7 and 13, by failing to comply with any of the provisions of statutory law in the seizure of Petitioner/Plaintiff's animals.

156. Unless Respondents/Defendants and their agents and assigns are prevented and enjoined from continued possession of Petitioner/Plaintiff's animals, she will continue to suffer irreparable harm.

157. Petitioner/Plaintiff has no feasible administrative remedy and no plain, speedy and adequate remedy in the ordinary course of law for the redress of her injury, particularly where LADAC has not filed criminal charges (preventing a motion in criminal court for the return of property) and categorically refuses to provide any information regarding Petitioner/Plaintiff's animals or to hold *required hearings* in connection with the seizure of the animals.

158. Animals are unlike other types of property, and cannot be warehoused in cold, isolated, concrete cells without any human or animal interaction, yet that is precisely what LADAC is doing to them.

159. Petitioner/Plaintiff has devoted decades of her life rescuing and providing quality care for unwanted and abandoned animals. Simply put, rescuing animals is her life's mission.

160. Continued impound of Petitioner/Plaintiff is causing irreparable harm to Petitioner/Plaintiff as she has spent countless hours caring for them and finding homes for them.

1 161. The injunctive relief sought in this Petition/Complaint is the sole remedy to
2 redress Petitioner's ongoing injury.

3 **SECOND CAUSE OF ACTION/CLAIM FOR RELIEF**

4 **Violation of California Constitution Art. 1, Sections 7 and 13**

5 162. Petitioner/Plaintiff repeats, realleges, and incorporates by reference all of the
6 allegations in paragraphs 10 through 153 as if fully set forth herein.

7 163. The California Constitution, in section 7 of Article 1, prohibits the deprivation of
8 life, liberty, or property by State actors, without due process.

9 164. The California Constitution, in section 13 of Article 1, prohibits unreasonable
10 search and seizure of property without a search warrant.

11 165. Respondent/Defendant County of Los Angeles, through LADAC, has deprived
12 Plaintiff/Petitioner of her property conducting an unreasonable search and seizure of
13 Plaintiff/Petitioner's property without even a pretense of due process, ignoring all laws that were
14 specifically enacted to provide due process to animal owners in cases involving the seizure of
15 animals by a government entity like LADAC.

16 **THIRD CAUSE OF ACTION/CLAIM FOR RELIEF**

17 **Violation of 42 U.S.C. §1983**

18 **(Fourteenth Amendment to the United States Constitution)**

19 166. Petitioner/Plaintiff repeats, realleges, and incorporates by reference all of the
20 allegations in paragraphs 10 through 153 as if fully set forth herein.

21 167. The Fourteenth Amendment to the United States Constitution guarantees the right
22 of any person not to be deprived of life, liberty, or property by the State without due process of
23 law.

24 168. LADAC and LASD personnel were acting under color of State law when they
25 seized Petitioner/Plaintiff's animals.

26 169. Despite the fact that LADAC obtained a search warrant, by disregarding
27 applicable law, failing to convene either a pre-seizure or post-seizure hearing, they have violated
28

Petitioner/Plaintiff's right to due process and continue to do so by retaining possession of her animals.

FOURTH CAUSE OF ACTION/CLAIM FOR RELIEF

Claim for Injunctive Relief Pursuant to Cal. Code of Civ. Proc. §526

170. Petitioner/Plaintiff repeats, realleges, and incorporates by reference all of the allegations in paragraphs 10 through 153 as if fully set forth herein.

171. Respondent/Defendant County of Los Angeles has a clear and present ministerial duty to comply with *all of the provision of PC §597.1*.

172. Petitioner/Plaintiff has no feasible administrative remedy and no plain, speedy and adequate remedy in the ordinary course of law. The injunctive relief sought in this Petition for Writ of Mandate and Complaint for damages pursuant to 42 U.S.C. §1983 and accompanying *ex parte* application for a temporary restraining order is the only relief available to Petitioner/Plaintiff.

173. Petitioner will suffer irreparable harm if the requested relief is not granted, as she will be permanently deprived of possession and ownership of her animals, as LADAC will kill them and/or transfer them to third parties.

174. LADAC must not be permitted to seize animals, disregard applicable laws, refuse to convene any hearings to contest the seizure, and charge money for the storage of the seized animals.

WHEREFORE, Petitioner/Plaintiff requests:

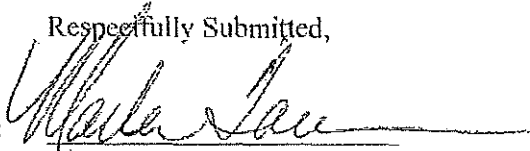
1. Issuance of an order to immediately release all of the seized animals to Petitioner/Plaintiff and/or her designated agents; or
2. Issuance of an order prohibiting LADAC (or its agents) from making any disposition of the seized animals adverse to the interests of Petitioner/Plaintiff pending the resolution of this matter in its entirety; and

3. Issuance of an order prohibiting LADAC from demanding any payment as a condition or prerequisite for retaining ownership of the seized animals pending the resolution of this matter in its entirety; and
4. Actual damages, statutory damages, punitive damages, and such other relief as provided by applicable statutes; and
5. The costs of bringing this suit, including attorneys' fees pursuant to 42 U.S.C. §1988 or other statute; and
6. Such other relief as this Court deems just, proper, and equitable.

Dated: November 3, 2022

Respectfully Submitted,

By:


Marla Tauscher
Attorney for Petitioner/Plaintiff
Julia Mildenerberger

1 VERIFICATION

2
3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I, Julia Mildenerger, Petitioner/Plaintiff in this matter, have read the foregoing Verified
5 Petition for Writ of Mandate and Complaint for Damages pursuant to 42 U.S.C §1983 and I am
6 familiar with its contents.

7 The matters stated in the foregoing document are true of my own knowledge except as
8 to those matters which are stated on information and belief, and as to those matters, I believe
9 them to be true.

10 I declare under penalty of perjury, under the laws of the State of California, that the
11 foregoing is true and correct.

12
13 Executed on November 3, 2022 at Littlerock, California.

14
15 
16 Julia Mildenerger
17
18
19
20
21
22
23
24
25
26
27
28

JULIA MILDENBERGER'S PETITION FOR WRIT OF MANDATE AND
COMPLAINT FOR DAMAGES PURSUANT TO 42 U.S.C. §1983

EXHIBIT 1

This license must be clearly visible to the general public and to patrons entering the facility
as defined in Los Angeles County Code Title 10 Section 10.28.280

COUNTY LICENSENo. B21-2167DK

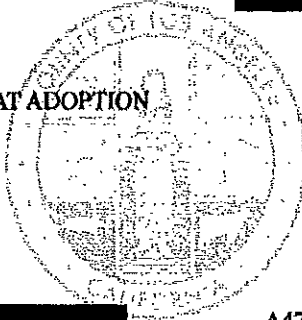
COUNTY OF LOS ANGELES - STATE OF CALIFORNIA

THE LICENSEE NAMED HEREON HAS PAID TO THE UNDERSIGNED TAX COLLECTOR THE AMOUNT SHOWN AND IS HEREBY
LICENSED, UNDER PROVISIONS OF TITLE 10, FOR THE PERIOD EXPIRING ON THE DATE SHOWN TO CARRY ON BUSINESS OR OCCUPATION
OR MAINTAIN THE ANIMAL SPECIFIED, AT THE LOCATION SHOWN. THIS LICENSE IS SUBJECT TO ANY SPECIAL CONDITIONS SHOWN AND IS
VALID ONLY IN THE UNINCORPORATED TERRITORY OR IN CONTRACTING CITIES OF LOS ANGELES COUNTY.

LICENSE FEE	\$ 175.00	TOTAL	\$ 175.00	DATE OF ISSUE	9/2/2021	DATE OF EXPIRATION	9/2/2022
-------------	-----------	-------	-----------	---------------	----------	--------------------	----------

HUMANE ORGANIZATION
CONDITION/LIMITATION APPLY

SOUTHERN CALIFORNIA CAT ADOPTION
JULIA MILDENBERGER
35762 80TH EAST ST
LITTLEROCK, CA 93543



COUNTY TAX COLLECTOR
and Ex-officio County License Collector

MARCIA MAYEDA
DIRECTOR OF ANIMAL CONTROL

Facility Inspection grade: A

A4751942

By JAIME PALAFOX

LICENSEE LOCATION - BUSINESS OR TYPE ANIMAL

Rev. A - 05/03/10

THIS LICENSE IS NOT TRANSFERABLE

This license must be clearly visible to the general public and to patrons entering the facility
as defined in Los Angeles County Code Title 10 Section 10.28.280

COUNTY LICENSENo. B21-2167CK

COUNTY OF LOS ANGELES - STATE OF CALIFORNIA

THE LICENSEE NAMED HEREON HAS PAID TO THE UNDERSIGNED TAX COLLECTOR THE AMOUNT SHOWN AND IS HEREBY LICENSED, UNDER PROVISIONS OF TITLE 10, FOR THE PERIOD EXPIRING ON THE DATE SHOWN TO CARRY ON BUSINESS OR OCCUPATION OR MAINTAIN THE ANIMAL SPECIFIED, AT THE LOCATION SHOWN. THIS LICENSE IS SUBJECT TO ANY SPECIAL CONDITIONS SHOWN AND IS VALID ONLY IN THE UNINCORPORATED TERRITORY OR IN CONTRACTING CITIES OF LOS ANGELES COUNTY.

LICENSE FEE	\$ 175.00	TOTAL	\$ 175.00	DATE OF ISSUE	9/2/2021	DATE OF EXPIRATION	9/2/2022
-------------	-----------	-------	-----------	---------------	----------	--------------------	----------

HUMANE ORGANIZATION

CONDITION/LIMITATION APPLY

SOUTHERN CALIFORNIA CAT ADOPTION
JULIA MILDENBERGER
35762 80TH EAST ST
LITTLEROCK, CA 93543



COUNTY TAX COLLECTOR
and Ex-officio County License Collector

MARCIA MAYEDA
DIRECTOR OF ANIMAL CONTROL

Facility Inspection grade: A

A4751940



By JAIME PALAFOX

LICENSEE LOCATION - BUSINESS OR TYPE ANIMAL

Rev. A - 0503/10

THIS LICENSE IS NOT TRANSFERABLE

EXHIBIT 2

Date Violations Corrected 10/25/16		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
--	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.



☐ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

Score 94	Grade A	INSPECTION NO. 2 21670K	DATE OF INSPECTION 10/21/16	COMPLIANCE DATE	E-MAIL ADDRESS	PHONE 661-526-1300	FAX	ZIP 93551	GRADE CARD ISSUED <input checked="" type="checkbox"/>
FACILITY NAME SOUTHERN CALIFORNIA CAT ADOPTION		FACILITY ADDRESS 35762 80TH EAST ST		FACILITY OWNER/ISS JULIA MILDENBERGER		FACILITY VETERINARIAN MISSION ANIMAL HOSPITAL		VETERINARIAN ADDRESS 845 W. PALMDALE	
TYPE OF FACILITY BO DO PS GP MG AM AE AD WA		LOCATION OF GRADE CARD FRONT KENNEL FENCE		CITY PRIMROSE		CITY PRIMROSE		CITY PRIMROSE	

SECTION I			
Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Medical Care and Health of the Animals	
1.	Incompatible animals housed together or in direct proximity.	17.	Isolation-sick/injured animals housed with healthy animals
2.	Housing facilities in disrepair - immediate risk	18.	Animals with irremediable/serious suffering
3.	Facility seriously overcrowded - needs immediate correction	19.	Animals with zoonotic diseases/public contact
4.	Ventilation/Air quality - causes breathing difficulties	20.	Untreated illness/injury
5.	Ambient temperature - excessive heat or cold causing risk	21.	Seriously underweight animals
6.	Primary enclosures insufficient for normal posture	22.	Animals inadequately groomed - causing severe injury
7.	Lack of shelter - high risk	23.	Causing unfit animals to work
8.	Lighting insufficient to properly clean/inspect	Sanitation	
Food		24.	Filthy - immediate risk
9.	No food available	25.	No cleaning supplies and/or materials
10.	Food is spoiled	26.	Waste disposal system absent or broken
11.	Perishable food improperly stored - high risk	27.	Excessive vermin infestation - immediate risk
Water		28.	Excessive clutter - impossible to sanitize
12.	No water available	Safety and Security	
13.	Water is contaminated	29.	Dangerous animals at risk of escape
Animal Safety		30.	Dangerous animals available for public contact
14.	Animal injured or died due to act or omission	31.	Lack of or insufficient fire suppression system
15.	Hazardous environment/equipment - high risk	32.	Predatory animals can readily gain access to animals
Euthanasia Practices		33.	Lack of Rabies Certificates - multiple violations
16.	Use of non-approved methods of euthanasia	34.	Lack of Distemper vaccinations - multiple (guard dogs)
SECTION II			
POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 6
Housing Facilities		Sanitation	
35.	Housing facilities are in disrepair - moderate risk	58.	Animal housing cannot be readily sanitized
36.	Facility is overcrowded - moderate risk	59.	Greater than 24-hour accumulation of feces/waste
37.	Ventilation is stagnant - moderate risk	60.	Dirty - moderate risk
38.	Ambient temperature - moderate risk	61.	Bowls/hoops/equipment/materials and supplies not sanitized
39.	Insufficient shelter - moderate risk	62.	Waste disposal system insufficient
40.	Crates stacked in violation of Los Angeles County Code Section 10.40.010M	63.	Moderate vermin infestation
41.	Lighting poor - difficult to properly clean/inspect	64.	Moderate clutter - impeding sanitation
42.	Housed primarily on wire floor (H&S § 122065.5)	Safety and Security	
43.	Kennel runs - inappropriate surfacing	65.	Non-dangerous animals at risk of escape
Food		66.	Lack of emergency evacuation plan
44.	Not nutritionally sufficient for age, species or other condition	67.	Predatory animals can gain access to animals - moderate risk
45.	Perishable food improperly stored - moderate risk	68.	Failure to provide proper notification by traveling circus/carnival (H&S § 25889.1)
Water		Exercise and Socialization	
46.	Large number of animals without water	69.	Animals housed 24 hours/day and not exercised daily
47.	Water in danger of contamination	70.	Primary enclosure insufficient for daily housing
48.	Water receptacles damaged/incapable of proper disinfection	71.	Display of stereotypical cage stress behavior
49.	No warm water available (grooming parlors)	72.	Adequate socialization (H&S § 122065(e))
Animal Safety		Presence of Illegal Animals	
50.	Ill and/or injured animals without treatment - moderate risk	73.	Turtles with a carapace length of less than four (4) inches (CCR § 2612.1)
51.	Isolation facilities inadequate - moderate risk	74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC § 599)
52.	Moderately underweight animals	75.	Dyed live chicks, rabbits, ducklings, other fowl (PC § 599)
53.	Animals inadequately groomed - causing minor injury or moderate risk of injury	76.	Dogs under 8 weeks old (H&S § 122155(b))
54.	Animals with zoonotic disease/staff access	77.	Animals prohibited by F&W, USFWS, USDA, etc.
55.	Lack of access to veterinarian with species specific training	78.	Unweaned birds who trained staff - H&S § 122321
56.	Hazardous environment/equipment - moderate risk		
Permits and Documentation			
57.	Lack of required permits and documentation		
SECTION III			
POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Medical Care and Health of the Animals	
79.	Some disrepair - low risk	85.	Ectoparasites/Endoparasites
80.	Poor ambient temperature - low risk	86.	Slightly underweight animals
81.	Insufficient shelter - low risk	87.	Ill animals, minor injuries - low risk
82.	Lack of resting boards (H&S § 122065(d))	88.	Failure to have present or on-call veterinarian - rodeos (PC § 598.7b)
Food and Water		89.	Failure to have conveyance available for injured animals
83.	Uncovered food receptacles	90.	Cobwebs
84.	Several animals without water and displaying thirst	91.	Some vermin infestation - low

SCORE AND GRADING								
	Deductions			Scoring			Grade Earned	
	Section I:	0		100	Points possible		A	(90-100 points)
	Section II:	6		- 6	Deductions		B	(80-89 points)
	Section III:	0		94	Final Score		C	(70-79 points)
	Section IV:	0					-	(less than 70 points)
	Total Deductions:	6						

ORDERS TO COMPLY AND FOLLOW UP			
OTC Issued:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	OTC Number:	Reinspection Date:
Comments:			
<p>DOG DOG NAMED "MISTY" WAS MATTED, ISSUED ORDER TO COMPLY TO HAVE MISTY GROOMED TO AVOID FURTHER MATTED FUR.</p> <p>10/25/16</p> <p>MISTY WAS SHAVED BY MISSION ANIMAL HOSPITAL ON 10/24/16 INV # 156723 PHOTO - INVOICE ATTACHED TO FILE.</p>			

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---



See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☐ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A	SECTION I	
Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted	0
Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk Water 12. No water available 13. Water is contaminated Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk Euthanasia Practices 16. Use of non-approved methods of euthanasia		Medical Care and Health of the Animals 17. Isolation-sick/injured animals housed with healthy animals 18. Animals with immediate/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work Sanitation 24. Filthy-immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificates- multiple violations 34. Lack of Disemper vaccinations - multiple (guard dogs)	
SECTION II		Points Deducted	
POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY		0	
Housing Facilities 35. Housing facilities are in disrepair-moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Crates stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122085.5) 43. Kennel runs - inappropriate surfacing Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming stations) Animal Safety 50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic disease/staff access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk Permits and Documentation 57. Lack of required permits and documentation		Sanitation 58. Animal housing cannot be readily sterilized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/toys/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25989.1) Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S §122085(e)) Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR §2612.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599) 75. Dyed live chicks, rabbits, ducklings, other fowl (PC §599) 76. Dogs under 8 weeks old (H&S §122155(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds w/o trained staff - H&S §122321	
SECTION III		Points Deducted	
POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		0	
Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of resting boards (H&S §122065(d)) Food and Water 83. Uncovered food receptacles 84. Several animals without water and displaying thirst		Medical Care and Health of the Animals 85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. Ill animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeos (PC §596.7b) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low	

SCORE AND GRADING									
Deductions		→	Scoring			Grade Earned			
Section I:	0		100	Points possible		X	A		(90-100 points)
Section II:	0		- 0	Deductions			B		(80-89 points)
Section III:	0		100	Final Score			C		(70-79 points)
Section IV:	0						-		(less than 70 points)
Total Deductions:	0								

[illegible]

Data Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.



☒ No violations observed at the time of inspection



☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A	SECTION I Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0		
Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA		Housing Facilities				
		1. Incompatible animals housed together or in direct proximity.				
		2. Housing facilities in disrepair - immediate risk				
		3. Facility seriously overcrowded - needs immediate correction				
		4. Ventilation/Air quality - causes breathing difficulties				
		5. Ambient temperature - excessive heat or cold causing risk				
		6. Primary enclosures insufficient for normal posture				
		7. Lack of shelter - high risk				
		8. Lighting insufficient to properly clean/inspect				
		9. No food available				
		10. Food is spoiled				
		11. Perishable food improperly stored - high risk				
		12. No water available				
		13. Water is contaminated				
		Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA		Medical Care and Health of the Animals		
				17. Isolation sick/injured animals housed with healthy animals		
18. Animals with immediate/serious suffering						
19. Animals with zoonotic diseases/public contact						
20. Untreated illness/injury						
21. Seriously underweight animals						
22. Animals inadequately groomed - causing severe injury						
23. Causing unfit animals to work						
24. Filthy - immediate risk						
25. No cleaning supplies and/or materials						
26. Waste disposal system absent or broken						
27. Excessive vermin infestation - immediate risk						
28. Excessive clutter - impossible to sanitize						
29. Dangerous animals at risk of escape						
30. Dangerous animals available for public contact						
Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA				Safety and Security		
		31. Lack of or insufficient fire suppression system				
		32. Predatory animals can readily gain access to animals				
		33. Lack of Rabies Certificates - multiple violations				
		34. Lack of Distemper vaccinations - multiple (guard dogs)				
		35. Housing facilities are in disrepair - moderate risk				
		36. Facility is overcrowded - moderate risk				
		37. Ventilation is stagnant - moderate risk				
		38. Ambient temperature - moderate risk				
		39. Insufficient shelter - moderate risk				
		40. Cages stacked in violation of Los Angeles County Code Section 10.40.010M				
		41. Lighting poor - difficult to properly clean/inspect				
		42. Housed primarily on wire floor (H&S §122085.5)				
		43. Kennel runs - inappropriate surfacing				
		44. Not nutritionally sufficient for age, species or other condition				
		Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA		Sanitation		
45. Perishable food improperly stored - moderate risk						
46. Large number of animals without water						
47. Water in danger of contamination						
48. Water receptacles damaged/incapable of proper disinfection						
49. No warm water available (grooming parlors)						
50. Ill and/or injured animals without treatment - moderate risk						
51. Isolation facilities inadequate - moderate risk						
52. Moderately underweight animals						
53. Animals inadequately groomed - causing minor injury or moderate risk of injury						
54. Animals with zoonotic diseases/staff access						
55. Lack of access to veterinarian with species specific training						
56. Hazardous environment/equipment - moderate risk						
57. Lack of required permits and documentation						
58. Animal housing cannot be readily sanitized						
Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA				Safety and Security		
		59. Greater than 24-hour accumulation of feces/waste				
		60. Dirty - moderate risk				
		61. Bowls/foods/equipment/materials and supplies not sanitized				
		62. Waste disposal system insufficient				
		63. Moderate vermin infestation				
		64. Moderate clutter - impeding sanitation				
		65. Non dangerous animals at risk of escape				
		66. Lack of emergency evacuation plan				
		67. Predatory animals can gain access to animals - moderate risk				
		68. Failure to provide proper notification by traveling driver/cemvel (H&S §25989.1)				
		69. Animals housed 24 hours/day and not exercised daily				
		70. Primary enclosure insufficient for daily housing				
		71. Display of stereotypical cage stress behavior				
		72. Adequate socialization (H&S §122065(e))				
		Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA		Exercise and Socialization		
73. Turtles with a carapace length of less than four (4) inches (CCR §2612.1)						
74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)						
75. Dyed live chicks, rabbits, ducklings, other fowl (PC §599)						
76. Dogs under 8 weeks old (H&S §122155(b))						
77. Animals prohibited by F&W, USFWS, USDA, etc.						
78. Unweaned birds w/o trained staff - H&S §122321						
79. Some disrepair - low risk						
80. Poor ambient temperature - low risk						
81. Insufficient shelter - low risk						
82. Lack of nesting boards (H&S §122065(d))						
83. Uncovered food receptacles						
84. Several animals without water and displaying thirst						
85. Ectoparasites/Endoparasites						
Facility Information: FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 3572 80TH EAST ST FACILITY OWNER: JULIA MILLERBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PALMDALE TYPE OF FACILITY: HO DATE OF INSPECTION: 11/21/17 INSPECTOR: NO. 3 CHIC LICENSE NO.: 21670X PHONE: 661-526-1300 ZIP: 93551 CITY: PALMDALE COUNTY: KERN LOCATION OF GRADE CARD: ENTRANCE KENNEL AREA				Medical Care and Health of the Animals		
				86. Slightly underweight animals		
		87. Ill animals, minor injuries - low risk				
		88. Failure to have present or on-call veterinarian - rodeos (PC §596.7b)				
		89. Failure to have conveyance available for injured animals				
		90. Cobwebs				
		91. Some vermin infestation - low				

SCORE AND GRADING					
Deductions		→	Scoring		<div style="text-align: center;">X</div> Grade Earned
Section I:	0		100	Points possible	
Section II:	0		- 0	Deductions	
Section III:	0		100	Final Score	
Section IV:	0				
Total Deductions:					<div style="text-align: center;">A</div> (90-100 points)
					<div style="text-align: center;">B</div> (80-89 points)
					<div style="text-align: center;">C</div> (70-79 points)
					<div style="text-align: center;">-</div> (less than 70 points)

[illegible]

Date Violations Corrected		 COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT		 <small>COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL</small>
See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.				
<input checked="" type="checkbox"/> No violations observed at the time of inspection <input type="checkbox"/> Complaint allegations not observed at the time of inspection.				
Score 100		Grade A		
INSPECTION NO. 102-3-017 DATE OF INSPECTION 11/21/17 COMPLAINT DATE INSPECTOR C. L. FRIEROCK OWNER NAME JULIA MILDENBERGER OWNER PHONE 357-22-8074 OWNER ADDRESS 357-22-8074 EAST ST CITY PACIFIC PALMS STATE CA ZIP 91351 TYPE OF FACILITY DOGS LOCATION OF EXTENDED KENNEL WALL		VIOLATIONS IN THIS CATEGORY POSE AN IMMEDIATE THREAT TO THE HEALTH AND SAFETY OF THE ANIMALS. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		
SECTION I Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk Water 12. No water available 13. Water is contaminated Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk Euthanasia Practices 16. Use of non-approved methods of euthanasia		Medical Care and Health of the Animals 17. Isolation sick/injured animals housed with healthy animals 18. Animals with immediate/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work Sanitation 24. Filthy - immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificates - multiple violations 34. Lack of Distemper vaccinations - multiple (guard dogs)		
SECTION II Housing Facilities 35. Housing facilities are in disrepair - moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Cages stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S § 122085.5) 43. Kennel runs - inappropriate surfacing Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors) Animal Safety 50. If and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic diseases/leaky scopes 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk Permits and Documentation 57. Lack of required permits and documentation		POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY		
SECTION III Housing Facilities 58. Housing facilities cannot be readily sterilized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/foods/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S § 26349.1) Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S § 122085.5) Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR § 2612.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC § 599) 75. Dried live chicks, rabbits, ducklings, other fowl (PC § 599) 76. Dogs under 8 weeks old (H&S § 122155.5) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds who trained staff - H&S § 122321		POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
SECTION IV Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of resting boards (H&S § 122085.5) Food and Water 83. Uncovered food receptacles 84. Several animals without water and displaying thirst		Medical Care and Health of the Animals 85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. If animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeo (PC § 599.7b) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low		

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---



See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☒ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A	SECTION I Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0
FACILITY NAME: SATURN CAVANA OH ADAMS FACILITY ADDRESS: 35762 80TH EAST ST FACILITY OWNER (S): JULIA MILDENBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 WEST PACIFIC BLVD TYPE OF FACILITY: (A)		SECTION II POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION III POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION IV POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION V POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION VI POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION VII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION VIII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION IX POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION X POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
		SECTION XI POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		
SECTION XII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XIII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XIV POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XV POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XVI POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XVII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XVIII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XIX POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XX POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXI POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXIII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXIV POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXV POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXVI POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXVII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXVIII POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXIX POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				
SECTION XXX POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY				

SCORE AND GRADING					
Deductions		Scoring		Grade Earned	
Section I	0	100	Points possible	X A	(90 - 100 points)
Section II:	0	- 0	Deductions	B	(80-89 points)
Section III:	0	100	Final Score	C	(70-79 points)
Section IV:	0			-	(less than 70 points)
Total Deductions:	0				

[illegible]

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☒ No violations observed at the time of inspection

☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A	SECTION I Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0	
DATE OF INSPECTION: 10.18.18 INSPECTION NO: 2167PK LICENSE NO: 2167PK E-MAIL ADDRESS: 661-526-1300 PHONE: 661-526-1300 FAX: 93551 GRADE CARD REQUEST: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		Housing Facilities			
		1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect			
		Medical Care and Health of the Animals			
		17. Isolation sick/injured animals housed with healthy animals 18. Animals with irremediable/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work			
		Food			
		9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk			
		Water			
		12. No water available 13. Water is contaminated			
		Animal Safety			
		14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk 16. Euthanasia Practices 16. Use of non-approved methods of euthanasia			
DATE OF INSPECTION: 10.18.18 COMPLIANCE DATE: 10.18.18 CITY: 47740000 OWNER PHONE: 661-526-1300 CITY: 47740000 LOCATION OF FACILITY: 661-526-1300 TYPE OF FACILITY: 661-526-1300		SECTION II POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
		Housing Facilities			
		35. Housing facilities are in disrepair-moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Cages stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122065.5) 43. Kennel runs - inappropriate surfacing			
		Sanitation			
		58. Animal housing cannot be readily sterilized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/food/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation			
		Food			
		44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk			
		Water			
		46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors)			
		Animal Safety			
50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic diseases/staff access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk					
Exercise and Socialization					
65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25989.1)					
Presence of Illegal Animals					
73. Turtles with a carapace length of less than four (4) inches (CGR §2612.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599) 75. Dyed live chicks, rabbits, ducklings, other fowl (PC §599) 76. Dogs under 8 weeks old (H&S §122155(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds who trained staff - H&S §122321					
FACILITY NAME: Southern California Car and Equipment FACILITY ADDRESS: 35762 80th East ST FACILITY OWNER (S): Julia Milpobalaga FACILITY VETERINARIAN: Mission Animal Hospital VETERINARIAN ADDRESS: 945 West Pampate Blvd TYPE OF FACILITY: 661-526-1300		SECTION III POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
		Housing Facilities			
		79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of nesting boards (H&S §122065(d))			
		Medical Care and Health of the Animals			
		85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. Ill animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeos (PC §596.7b)			
		Food and Water			
		83. Uncovered food receptacles 84. Several animals without water and displaying thirst			
		Sanitation			
		89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low			



Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	--	--	--

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

<input checked="" type="checkbox"/> No violations observed at the time of inspection		<input type="checkbox"/> Complaint allegations not observed at the time of inspection.																																																																																																													
Score <div style="font-size: 24pt; font-weight: bold;">100</div>	Grade <div style="font-size: 24pt; font-weight: bold;">A</div>	SECTION I Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY																																																																																																													
Facility Information DATE OF INSPECTION: 12/20/19 INSPECTION NO: 216796 COMPLIANCE DATE: EMAIL ADDRESS: PHONE: 661-526-1320 FAX: ZIP: 93551 RECEIPT:		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="2">Housing Facilities</th> <th colspan="2">Medical Care and Health of the Animals</th> </tr> <tr><td>1.</td><td>Incompatible animals housed together or in direct proximity.</td><td>17.</td><td>Isolation-sick/injured animals housed with healthy animals</td></tr> <tr><td>2.</td><td>Housing facilities in disrepair-immediate risk</td><td>18.</td><td>Animals with immediate/serious suffering</td></tr> <tr><td>3.</td><td>Facility seriously overcrowded - needs immediate correction</td><td>19.</td><td>Animals with zoonotic diseases/public contact</td></tr> <tr><td>4.</td><td>Ventilation/Air quality - causes breathing difficulties</td><td>20.</td><td>Untreated illness/injury</td></tr> <tr><td>5.</td><td>Ambient temperature - excessive heat or cold causing risk</td><td>21.</td><td>Seriously underweight animals</td></tr> <tr><td>6.</td><td>Primary enclosures insufficient for normal posture</td><td>22.</td><td>Animals inadequately groomed - causing severe injury</td></tr> <tr><td>7.</td><td>Lack of shelter - high risk</td><td>23.</td><td>Causing unfit animals to work</td></tr> <tr><td>8.</td><td>Lighting insufficient to properly clean/inspect</td><td colspan="2">Sanitation</td></tr> <tr><td colspan="2">Food</td><td>24.</td><td>Filthy-immediate risk</td></tr> <tr><td>9.</td><td>No food available</td><td>25.</td><td>No cleaning supplies and/or materials</td></tr> <tr><td>10.</td><td>Food is spoiled</td><td>26.</td><td>Waste disposal system absent or broken</td></tr> <tr><td>11.</td><td>Perishable food improperly stored - high risk</td><td>27.</td><td>Excessive vermin infestation - immediate risk</td></tr> <tr><td colspan="2">Water</td><td>28.</td><td>Excessive clutter - impossible to sanitize</td></tr> <tr><td>12.</td><td>No water available</td><td colspan="2">Safety and Security</td></tr> <tr><td>13.</td><td>Water is contaminated</td><td>29.</td><td>Dangerous animals at risk of escape</td></tr> <tr><td colspan="2">Animal Safety</td><td>30.</td><td>Dangerous animals available for public contact</td></tr> <tr><td>14.</td><td>Animal injured or died due to act or omission</td><td>31.</td><td>Lack of or insufficient fire suppression system</td></tr> <tr><td>15.</td><td>Hazardous environment/equipment - high risk</td><td>32.</td><td>Predatory animals can readily gain access to animals</td></tr> <tr><td colspan="2">Euthanasia Practices</td><td>33.</td><td>Lack of Rabies Certificates- multiple violations</td></tr> <tr><td>16.</td><td>Use of non-approved methods of euthanasia</td><td>34.</td><td>Lack of Distemper vaccinations - multiple (guard dogs)</td></tr> </table>		Housing Facilities		Medical Care and Health of the Animals		1.	Incompatible animals housed together or in direct proximity.	17.	Isolation-sick/injured animals housed with healthy animals	2.	Housing facilities in disrepair-immediate risk	18.	Animals with immediate/serious suffering	3.	Facility seriously overcrowded - needs immediate correction	19.	Animals with zoonotic diseases/public contact	4.	Ventilation/Air quality - causes breathing difficulties	20.	Untreated illness/injury	5.	Ambient temperature - excessive heat or cold causing risk	21.	Seriously underweight animals	6.	Primary enclosures insufficient for normal posture	22.	Animals inadequately groomed - causing severe injury	7.	Lack of shelter - high risk	23.	Causing unfit animals to work	8.	Lighting insufficient to properly clean/inspect	Sanitation		Food		24.	Filthy-immediate risk	9.	No food available	25.	No cleaning supplies and/or materials	10.	Food is spoiled	26.	Waste disposal system absent or broken	11.	Perishable food improperly stored - high risk	27.	Excessive vermin infestation - immediate risk	Water		28.	Excessive clutter - impossible to sanitize	12.	No water available	Safety and Security		13.	Water is contaminated	29.	Dangerous animals at risk of escape	Animal Safety		30.	Dangerous animals available for public contact	14.	Animal injured or died due to act or omission	31.	Lack of or insufficient fire suppression system	15.	Hazardous environment/equipment - high risk	32.	Predatory animals can readily gain access to animals	Euthanasia Practices		33.	Lack of Rabies Certificates- multiple violations	16.	Use of non-approved methods of euthanasia	34.	Lack of Distemper vaccinations - multiple (guard dogs)																								
Housing Facilities		Medical Care and Health of the Animals																																																																																																													
1.	Incompatible animals housed together or in direct proximity.	17.	Isolation-sick/injured animals housed with healthy animals																																																																																																												
2.	Housing facilities in disrepair-immediate risk	18.	Animals with immediate/serious suffering																																																																																																												
3.	Facility seriously overcrowded - needs immediate correction	19.	Animals with zoonotic diseases/public contact																																																																																																												
4.	Ventilation/Air quality - causes breathing difficulties	20.	Untreated illness/injury																																																																																																												
5.	Ambient temperature - excessive heat or cold causing risk	21.	Seriously underweight animals																																																																																																												
6.	Primary enclosures insufficient for normal posture	22.	Animals inadequately groomed - causing severe injury																																																																																																												
7.	Lack of shelter - high risk	23.	Causing unfit animals to work																																																																																																												
8.	Lighting insufficient to properly clean/inspect	Sanitation																																																																																																													
Food		24.	Filthy-immediate risk																																																																																																												
9.	No food available	25.	No cleaning supplies and/or materials																																																																																																												
10.	Food is spoiled	26.	Waste disposal system absent or broken																																																																																																												
11.	Perishable food improperly stored - high risk	27.	Excessive vermin infestation - immediate risk																																																																																																												
Water		28.	Excessive clutter - impossible to sanitize																																																																																																												
12.	No water available	Safety and Security																																																																																																													
13.	Water is contaminated	29.	Dangerous animals at risk of escape																																																																																																												
Animal Safety		30.	Dangerous animals available for public contact																																																																																																												
14.	Animal injured or died due to act or omission	31.	Lack of or insufficient fire suppression system																																																																																																												
15.	Hazardous environment/equipment - high risk	32.	Predatory animals can readily gain access to animals																																																																																																												
Euthanasia Practices		33.	Lack of Rabies Certificates- multiple violations																																																																																																												
16.	Use of non-approved methods of euthanasia	34.	Lack of Distemper vaccinations - multiple (guard dogs)																																																																																																												
Facility Information DATE OF INSPECTION: 12/20/19 INSPECTION NO: 216796 COMPLIANCE DATE: EMAIL ADDRESS: PHONE: 661-526-1320 FAX: ZIP: 93551 RECEIPT:		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="2">Housing Facilities</th> <th colspan="2">Sanitation</th> </tr> <tr><td>35.</td><td>Housing facilities are in disrepair-moderate risk</td><td>58.</td><td>Animal housing cannot be readily sterilized</td></tr> <tr><td>36.</td><td>Facility is overcrowded - moderate risk</td><td>59.</td><td>Greater than 24-hour accumulation of feces/waste</td></tr> <tr><td>37.</td><td>Ventilation is stagnant - moderate risk</td><td>60.</td><td>Dirty-moderate risk</td></tr> <tr><td>38.</td><td>Ambient temperature - moderate risk</td><td>61.</td><td>Bowls/food/equipment/materials and supplies not sanitized</td></tr> <tr><td>39.</td><td>Insufficient shelter - moderate risk</td><td>62.</td><td>Waste disposal system insufficient</td></tr> <tr><td>40.</td><td>Crates stacked in violation of Los Angeles County Code Section 10.40.010M</td><td>63.</td><td>Moderate vermin infestation</td></tr> <tr><td>41.</td><td>Lighting poor - difficult to properly clean/inspect</td><td>64.</td><td>Moderate clutter - impeding sanitation</td></tr> <tr><td>42.</td><td>Housed primarily on wire floor (H&S §122065.5)</td><td colspan="2">Safety and Security</td></tr> <tr><td>43.</td><td>Kennel runs - inappropriate surfacing</td><td>65.</td><td>Non-dangerous animals at risk of escape</td></tr> <tr><td colspan="2">Food</td><td>66.</td><td>Lack of emergency evacuation plan</td></tr> <tr><td>44.</td><td>Not nutritionally sufficient for age, species or other condition</td><td>67.</td><td>Predatory animals can gain access to animals - moderate risk</td></tr> <tr><td>45.</td><td>Perishable food improperly stored - moderate risk</td><td>68.</td><td>Failure to provide proper notification by traveling circus/carnival (H&S §25989.1)</td></tr> <tr><td colspan="2">Water</td><td colspan="2">Exercise and Socialization</td></tr> <tr><td>46.</td><td>Large number of animals without water</td><td>69.</td><td>Animals housed 24 hours/day and not exercised daily</td></tr> <tr><td>47.</td><td>Water in danger of contamination</td><td>70.</td><td>Primary enclosure insufficient for daily housing</td></tr> <tr><td>48.</td><td>Water receptacles damaged/incapable of proper disinfection</td><td>71.</td><td>Display of stereotypical cage stress behavior</td></tr> <tr><td>49.</td><td>No warm water available (grooming parlors)</td><td>72.</td><td>Adequate socialization (H&S §122065(e))</td></tr> <tr><td colspan="2">Animal Safety</td><td colspan="2">Prevention of Illegal Animals</td></tr> <tr><td>50.</td><td>Sick and/or injured animals without treatment - moderate risk</td><td>73.</td><td>Turtles with a carapace length of less than four (4) inches (CCR §2612.1)</td></tr> <tr><td>51.</td><td>Isolation facilities inadequate - moderate risk</td><td>74.</td><td>Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)</td></tr> <tr><td>52.</td><td>Moderately underweight animals</td><td>75.</td><td>Dyed live chicks, rabbits, ducklings, other fowl (PC §599)</td></tr> <tr><td>53.</td><td>Animals inadequately groomed - causing minor injury or moderate risk of injury</td><td>76.</td><td>Dogs under 8 weeks old (H&S §122155(b))</td></tr> <tr><td>54.</td><td>Animals with zoonotic disease/staff access</td><td>77.</td><td>Animals prohibited by F&W, USFWS, USDA, etc.</td></tr> <tr><td>55.</td><td>Lack of access to veterinarian with species specific training</td><td>78.</td><td>Unweaned birds w/o trained staff - H&S §122321</td></tr> <tr><td>56.</td><td>Hazardous environment/equipment - moderate risk</td><td colspan="2">Permits and Documentation</td></tr> <tr><td colspan="2">Permits and Documentation</td><td>57.</td><td>Lack of required permits and documentation</td></tr> </table>		Housing Facilities		Sanitation		35.	Housing facilities are in disrepair-moderate risk	58.	Animal housing cannot be readily sterilized	36.	Facility is overcrowded - moderate risk	59.	Greater than 24-hour accumulation of feces/waste	37.	Ventilation is stagnant - moderate risk	60.	Dirty-moderate risk	38.	Ambient temperature - moderate risk	61.	Bowls/food/equipment/materials and supplies not sanitized	39.	Insufficient shelter - moderate risk	62.	Waste disposal system insufficient	40.	Crates stacked in violation of Los Angeles County Code Section 10.40.010M	63.	Moderate vermin infestation	41.	Lighting poor - difficult to properly clean/inspect	64.	Moderate clutter - impeding sanitation	42.	Housed primarily on wire floor (H&S §122065.5)	Safety and Security		43.	Kennel runs - inappropriate surfacing	65.	Non-dangerous animals at risk of escape	Food		66.	Lack of emergency evacuation plan	44.	Not nutritionally sufficient for age, species or other condition	67.	Predatory animals can gain access to animals - moderate risk	45.	Perishable food improperly stored - moderate risk	68.	Failure to provide proper notification by traveling circus/carnival (H&S §25989.1)	Water		Exercise and Socialization		46.	Large number of animals without water	69.	Animals housed 24 hours/day and not exercised daily	47.	Water in danger of contamination	70.	Primary enclosure insufficient for daily housing	48.	Water receptacles damaged/incapable of proper disinfection	71.	Display of stereotypical cage stress behavior	49.	No warm water available (grooming parlors)	72.	Adequate socialization (H&S §122065(e))	Animal Safety		Prevention of Illegal Animals		50.	Sick and/or injured animals without treatment - moderate risk	73.	Turtles with a carapace length of less than four (4) inches (CCR §2612.1)	51.	Isolation facilities inadequate - moderate risk	74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)	52.	Moderately underweight animals	75.	Dyed live chicks, rabbits, ducklings, other fowl (PC §599)	53.	Animals inadequately groomed - causing minor injury or moderate risk of injury	76.	Dogs under 8 weeks old (H&S §122155(b))	54.	Animals with zoonotic disease/staff access	77.	Animals prohibited by F&W, USFWS, USDA, etc.	55.	Lack of access to veterinarian with species specific training	78.	Unweaned birds w/o trained staff - H&S §122321	56.	Hazardous environment/equipment - moderate risk	Permits and Documentation		Permits and Documentation		57.	Lack of required permits and documentation
Housing Facilities		Sanitation																																																																																																													
35.	Housing facilities are in disrepair-moderate risk	58.	Animal housing cannot be readily sterilized																																																																																																												
36.	Facility is overcrowded - moderate risk	59.	Greater than 24-hour accumulation of feces/waste																																																																																																												
37.	Ventilation is stagnant - moderate risk	60.	Dirty-moderate risk																																																																																																												
38.	Ambient temperature - moderate risk	61.	Bowls/food/equipment/materials and supplies not sanitized																																																																																																												
39.	Insufficient shelter - moderate risk	62.	Waste disposal system insufficient																																																																																																												
40.	Crates stacked in violation of Los Angeles County Code Section 10.40.010M	63.	Moderate vermin infestation																																																																																																												
41.	Lighting poor - difficult to properly clean/inspect	64.	Moderate clutter - impeding sanitation																																																																																																												
42.	Housed primarily on wire floor (H&S §122065.5)	Safety and Security																																																																																																													
43.	Kennel runs - inappropriate surfacing	65.	Non-dangerous animals at risk of escape																																																																																																												
Food		66.	Lack of emergency evacuation plan																																																																																																												
44.	Not nutritionally sufficient for age, species or other condition	67.	Predatory animals can gain access to animals - moderate risk																																																																																																												
45.	Perishable food improperly stored - moderate risk	68.	Failure to provide proper notification by traveling circus/carnival (H&S §25989.1)																																																																																																												
Water		Exercise and Socialization																																																																																																													
46.	Large number of animals without water	69.	Animals housed 24 hours/day and not exercised daily																																																																																																												
47.	Water in danger of contamination	70.	Primary enclosure insufficient for daily housing																																																																																																												
48.	Water receptacles damaged/incapable of proper disinfection	71.	Display of stereotypical cage stress behavior																																																																																																												
49.	No warm water available (grooming parlors)	72.	Adequate socialization (H&S §122065(e))																																																																																																												
Animal Safety		Prevention of Illegal Animals																																																																																																													
50.	Sick and/or injured animals without treatment - moderate risk	73.	Turtles with a carapace length of less than four (4) inches (CCR §2612.1)																																																																																																												
51.	Isolation facilities inadequate - moderate risk	74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)																																																																																																												
52.	Moderately underweight animals	75.	Dyed live chicks, rabbits, ducklings, other fowl (PC §599)																																																																																																												
53.	Animals inadequately groomed - causing minor injury or moderate risk of injury	76.	Dogs under 8 weeks old (H&S §122155(b))																																																																																																												
54.	Animals with zoonotic disease/staff access	77.	Animals prohibited by F&W, USFWS, USDA, etc.																																																																																																												
55.	Lack of access to veterinarian with species specific training	78.	Unweaned birds w/o trained staff - H&S §122321																																																																																																												
56.	Hazardous environment/equipment - moderate risk	Permits and Documentation																																																																																																													
Permits and Documentation		57.	Lack of required permits and documentation																																																																																																												
Facility Information DATE OF INSPECTION: 12/20/19 INSPECTION NO: 216796 COMPLIANCE DATE: EMAIL ADDRESS: PHONE: 661-526-1320 FAX: ZIP: 93551 RECEIPT:		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="2">Housing Facilities</th> <th colspan="2">Medical Care and Health of the Animals</th> </tr> <tr><td>79.</td><td>Some disrepair - low risk</td><td>85.</td><td>Ectoparasites/Endoparasites</td></tr> <tr><td>80.</td><td>Poor ambient temperature - low risk</td><td>86.</td><td>Slightly underweight animals</td></tr> <tr><td>81.</td><td>Insufficient shelter - low risk</td><td>87.</td><td>Sick animals, minor injuries - low risk</td></tr> <tr><td>82.</td><td>Lack of nesting boards (H&S §122065(d))</td><td>88.</td><td>Failure to have present or on-call veterinarian - rodeos (PC §596.7b)</td></tr> <tr><td colspan="2">Food and Water</td><td>89.</td><td>Failure to have conveyance available for injured animals</td></tr> <tr><td>83.</td><td>Uncovered food receptacles</td><td>90.</td><td>Cobwebs</td></tr> <tr><td>84.</td><td>Several animals without water and displaying thirst</td><td>91.</td><td>Some vermin infestation - low</td></tr> </table>		Housing Facilities		Medical Care and Health of the Animals		79.	Some disrepair - low risk	85.	Ectoparasites/Endoparasites	80.	Poor ambient temperature - low risk	86.	Slightly underweight animals	81.	Insufficient shelter - low risk	87.	Sick animals, minor injuries - low risk	82.	Lack of nesting boards (H&S §122065(d))	88.	Failure to have present or on-call veterinarian - rodeos (PC §596.7b)	Food and Water		89.	Failure to have conveyance available for injured animals	83.	Uncovered food receptacles	90.	Cobwebs	84.	Several animals without water and displaying thirst	91.	Some vermin infestation - low																																																																												
Housing Facilities		Medical Care and Health of the Animals																																																																																																													
79.	Some disrepair - low risk	85.	Ectoparasites/Endoparasites																																																																																																												
80.	Poor ambient temperature - low risk	86.	Slightly underweight animals																																																																																																												
81.	Insufficient shelter - low risk	87.	Sick animals, minor injuries - low risk																																																																																																												
82.	Lack of nesting boards (H&S §122065(d))	88.	Failure to have present or on-call veterinarian - rodeos (PC §596.7b)																																																																																																												
Food and Water		89.	Failure to have conveyance available for injured animals																																																																																																												
83.	Uncovered food receptacles	90.	Cobwebs																																																																																																												
84.	Several animals without water and displaying thirst	91.	Some vermin infestation - low																																																																																																												

SCORE AND GRADING						
Deductions		→	Scoring		Grade Earned	
Section I:	0		100	Points possible	<input checked="" type="checkbox"/> A	(90-100 points)
Section II:	0		- 0	Deductions	<input type="checkbox"/> B	(80-89 points)
Section III:	0		100	Final Score	<input type="checkbox"/> C	(70-79 points)
Section IV:	0				<input type="checkbox"/> -	(less than 70 points)
Total Deductions:						

[illegible]

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☒ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

FACILITY NAME: SOUTHERN CALIFORNIA CAT HOSPITAL FACILITY ADDRESS: 57712 SOTAL EAST FACILITY OWNER/RS: JULIE MILDENBERGER FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL VETERINARIAN ADDRESS: 845 W. PANDATE TYPE OF FACILITY: (10) BO DO PS GP MG AM AE AD WA	INSPECTION NO: 3 OWNER: 2/67 DK COMPLAINT DATE: 12/20/19 E-MAIL ADDRESS: 661-536-1300 PHONE: 93551 ZIP: 93551 CITY: PANORAMA COUNTY: LOS ANGELES	SCORE: 100 GRADE: A GRADE CARD ISSUED: YES REPEAT: NO	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: center;">SECTION I</th> <th style="text-align: center;">Points Deducted</th> </tr> <tr> <th colspan="2" style="text-align: center;">Violations in this category pose an immediate threat to the health and safety of the animals.</th> <th></th> </tr> <tr> <th colspan="2" style="text-align: center;">POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY</th> <th></th> </tr> <tr> <td style="width: 50%; vertical-align: top;"> Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk Water 12. No water available 13. Water is contaminated Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk Euthanasia Practices 16. Use of non-approved methods of euthanasia </td> <td style="width: 50%; vertical-align: top;"> Medical Care and Health of the Animals 17. Isolation sick/injured animals housed with healthy animals 18. Animals with irremediable/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work Sanitation 24. Filthy - immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificates - multiple violations 34. Lack of Distemper vaccinations - multiple (guard dogs) </td> <td style="text-align: center; vertical-align: bottom;">0</td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: center;">SECTION II</th> <th style="text-align: center;">Points Deducted</th> </tr> <tr> <th colspan="2" style="text-align: center;">Violations in this category pose a moderate risk to the health and safety of the animals.</th> <th></th> </tr> <tr> <th colspan="2" style="text-align: center;">POINT VALUE: 8 POINTS FOR VIOLATIONS IN EACH CATEGORY</th> <th></th> </tr> <tr> <td style="width: 50%; vertical-align: top;"> Housing Facilities 35. Housing facilities are in disrepair - moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Crates stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122065.5) 43. Kennel runs - inappropriate surfacing Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors) Animal Safety 50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic diseases/staff access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk Permits and Documentation 57. Lack of required permits and documentation </td> <td style="width: 50%; vertical-align: top;"> Sanitation 58. Animal housing cannot be readily sanitized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/food/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25989.1) Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S §122065(e)) Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR §2412.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599) 75. Dyed live chicks, rabbits, ducklings, other fowl (PC §599) 76. Dogs under 8 weeks old (H&S §122153(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds w/o trained staff - H&S §122321 </td> <td style="text-align: center; vertical-align: bottom;">0</td> </tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: center;">SECTION III</th> <th style="text-align: center;">Points Deducted</th> </tr> <tr> <th colspan="2" style="text-align: center;">Violations in this category pose a low risk to the health and safety of the animals.</th> <th></th> </tr> <tr> <th colspan="2" style="text-align: center;">POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY</th> <th></th> </tr> <tr> <td style="width: 50%; vertical-align: top;"> Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of resting boards (H&S §122065(d)) Food and Water 83. Uncovered food receptacles 84. Several animals without water and displaying thirst </td> <td style="width: 50%; vertical-align: top;"> Medical Care and Health of the Animals 85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. Ill animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeos (PC §596.7b) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low </td> <td style="text-align: center; vertical-align: bottom;">0</td> </tr> </table>	SECTION I		Points Deducted	Violations in this category pose an immediate threat to the health and safety of the animals.			POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY			Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk Water 12. No water available 13. Water is contaminated Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk Euthanasia Practices 16. Use of non-approved methods of euthanasia	Medical Care and Health of the Animals 17. Isolation sick/injured animals housed with healthy animals 18. Animals with irremediable/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work Sanitation 24. Filthy - immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificates - multiple violations 34. Lack of Distemper vaccinations - multiple (guard dogs)	0	SECTION II		Points Deducted	Violations in this category pose a moderate risk to the health and safety of the animals.			POINT VALUE: 8 POINTS FOR VIOLATIONS IN EACH CATEGORY			Housing Facilities 35. Housing facilities are in disrepair - moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Crates stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122065.5) 43. Kennel runs - inappropriate surfacing Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors) Animal Safety 50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic diseases/staff access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk Permits and Documentation 57. Lack of required permits and documentation	Sanitation 58. Animal housing cannot be readily sanitized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/food/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25989.1) Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S §122065(e)) Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR §2412.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599) 75. Dyed live chicks, rabbits, ducklings, other fowl (PC §599) 76. Dogs under 8 weeks old (H&S §122153(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds w/o trained staff - H&S §122321	0	SECTION III		Points Deducted	Violations in this category pose a low risk to the health and safety of the animals.			POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY			Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of resting boards (H&S §122065(d)) Food and Water 83. Uncovered food receptacles 84. Several animals without water and displaying thirst	Medical Care and Health of the Animals 85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. Ill animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeos (PC §596.7b) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low	0
SECTION I		Points Deducted																																					
Violations in this category pose an immediate threat to the health and safety of the animals.																																							
POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY																																							
Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk Water 12. No water available 13. Water is contaminated Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk Euthanasia Practices 16. Use of non-approved methods of euthanasia	Medical Care and Health of the Animals 17. Isolation sick/injured animals housed with healthy animals 18. Animals with irremediable/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work Sanitation 24. Filthy - immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificates - multiple violations 34. Lack of Distemper vaccinations - multiple (guard dogs)	0																																					
SECTION II		Points Deducted																																					
Violations in this category pose a moderate risk to the health and safety of the animals.																																							
POINT VALUE: 8 POINTS FOR VIOLATIONS IN EACH CATEGORY																																							
Housing Facilities 35. Housing facilities are in disrepair - moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Crates stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122065.5) 43. Kennel runs - inappropriate surfacing Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors) Animal Safety 50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic diseases/staff access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk Permits and Documentation 57. Lack of required permits and documentation	Sanitation 58. Animal housing cannot be readily sanitized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/food/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25989.1) Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S §122065(e)) Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR §2412.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599) 75. Dyed live chicks, rabbits, ducklings, other fowl (PC §599) 76. Dogs under 8 weeks old (H&S §122153(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds w/o trained staff - H&S §122321	0																																					
SECTION III		Points Deducted																																					
Violations in this category pose a low risk to the health and safety of the animals.																																							
POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY																																							
Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of resting boards (H&S §122065(d)) Food and Water 83. Uncovered food receptacles 84. Several animals without water and displaying thirst	Medical Care and Health of the Animals 85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. Ill animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeos (PC §596.7b) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low	0																																					

SCORE AND GRADING									
Deductions			Scoring			Grade Earned			
Section I:	①		100	Points possible		X A	(90-100 points)		
Section II:	0		- 0	Deductions		B	(80-89 points)		
Section III:	0		100	Final Score		C	(70-79 points)		
Section IV:	0					-	(less than 70 points)		
Total Deductions:	0								

DAOC 14 - Revised 02/22/15 - PB

Date Violations Corrected <div style="font-size: 1.5em; font-weight: bold;">9-17-20</div>	<div style="font-weight: bold; margin-top: 5px;">COUNTY OF LOS ANGELES</div> <div style="font-weight: bold; margin-top: 5px;">DEPARTMENT OF ANIMAL CARE AND CONTROL</div> <div style="font-weight: bold; margin-top: 5px; font-size: 1.2em;">ANIMAL FACILITY INSPECTION REPORT</div>
--	--



See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☐ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

Score <div style="font-size: 1.5em; font-weight: bold;">96</div>	Grade <div style="font-size: 1.5em; font-weight: bold;">A</div>	<div style="border: 1px solid black; padding: 5px;"> SECTION I Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 5%;">Housing Facilities</th> <th style="width: 45%;">Violations</th> <th style="width: 5%;">Points Deducted</th> <th style="width: 45%;">Medical Care and Health of the Animals</th> </tr> <tr><td>1.</td><td>Incompatible animals housed together or in direct proximity.</td><td></td><td>17.</td><td>Isolation sick/injured animals housed with healthy animals</td></tr> <tr><td>2.</td><td>Housing facilities in disrepair - immediate risk</td><td></td><td>18.</td><td>Animals with immediate/serious suffering</td></tr> <tr><td>3.</td><td>Facility seriously overcrowded - needs immediate correction</td><td></td><td>19.</td><td>Animals with zoonotic diseases/public contact</td></tr> <tr><td>4.</td><td>Ventilation/Air quality - causes breathing difficulties</td><td></td><td>20.</td><td>Untreated illness/injury</td></tr> <tr><td>5.</td><td>Ambient temperature - excessive heat or cold causing risk</td><td></td><td>21.</td><td>Seriously underweight animals</td></tr> <tr><td>6.</td><td>Primary enclosures insufficient for normal posture</td><td></td><td>22.</td><td>Animals inadequately groomed - causing severe injury</td></tr> <tr><td>7.</td><td>Lack of shelter - high risk</td><td></td><td>23.</td><td>Causing unfit animals to work</td></tr> <tr><td>8.</td><td>Lighting insufficient to properly clean/inspect</td><td></td><td></td><td>Sanitation</td></tr> <tr><td></td><td>Food</td><td></td><td>24.</td><td>Filthy-immediate risk</td></tr> <tr><td>9.</td><td>No food available</td><td></td><td>25.</td><td>No cleaning supplies and/or materials</td></tr> <tr><td>10.</td><td>Food is spoiled</td><td></td><td>26.</td><td>Waste disposal system absent or broken</td></tr> <tr><td>11.</td><td>Perishable food improperly stored - high risk</td><td></td><td>27.</td><td>Excessive vermin infestation - immediate risk</td></tr> <tr><td></td><td>Water</td><td></td><td>28.</td><td>Excessive clutter - impossible to sanitize</td></tr> <tr><td>12.</td><td>No water available</td><td></td><td></td><td>Safety and Security</td></tr> <tr><td>13.</td><td>Water is contaminated</td><td></td><td>29.</td><td>Dangerous animals at risk of escape</td></tr> <tr><td></td><td>Animal Safety</td><td></td><td>30.</td><td>Dangerous animals available for public contact</td></tr> <tr><td>14.</td><td>Animal injured or died due to act or omission</td><td></td><td>31.</td><td>Lack of or insufficient fire suppression system</td></tr> <tr><td>15.</td><td>Hazardous environment/equipment - high risk</td><td></td><td>32.</td><td>Predatory animals can readily gain access to animals</td></tr> <tr><td></td><td>Euthanasia Practices</td><td></td><td>33.</td><td>Lack of Rabies Certificates - multiple violations</td></tr> <tr><td>16.</td><td>Use of non-approved methods of euthanasia</td><td></td><td>34.</td><td>Lack of Distemper vaccinations - multiple (guard dogs)</td></tr> </table>	Housing Facilities	Violations	Points Deducted	Medical Care and Health of the Animals	1.	Incompatible animals housed together or in direct proximity.		17.	Isolation sick/injured animals housed with healthy animals	2.	Housing facilities in disrepair - immediate risk		18.	Animals with immediate/serious suffering	3.	Facility seriously overcrowded - needs immediate correction		19.	Animals with zoonotic diseases/public contact	4.	Ventilation/Air quality - causes breathing difficulties		20.	Untreated illness/injury	5.	Ambient temperature - excessive heat or cold causing risk		21.	Seriously underweight animals	6.	Primary enclosures insufficient for normal posture		22.	Animals inadequately groomed - causing severe injury	7.	Lack of shelter - high risk		23.	Causing unfit animals to work	8.	Lighting insufficient to properly clean/inspect			Sanitation		Food		24.	Filthy-immediate risk	9.	No food available		25.	No cleaning supplies and/or materials	10.	Food is spoiled		26.	Waste disposal system absent or broken	11.	Perishable food improperly stored - high risk		27.	Excessive vermin infestation - immediate risk		Water		28.	Excessive clutter - impossible to sanitize	12.	No water available			Safety and Security	13.	Water is contaminated		29.	Dangerous animals at risk of escape		Animal Safety		30.	Dangerous animals available for public contact	14.	Animal injured or died due to act or omission		31.	Lack of or insufficient fire suppression system	15.	Hazardous environment/equipment - high risk		32.	Predatory animals can readily gain access to animals		Euthanasia Practices		33.	Lack of Rabies Certificates - multiple violations	16.	Use of non-approved methods of euthanasia		34.	Lack of Distemper vaccinations - multiple (guard dogs)																																																																										
Housing Facilities	Violations	Points Deducted	Medical Care and Health of the Animals																																																																																																																																																																																	
1.	Incompatible animals housed together or in direct proximity.		17.	Isolation sick/injured animals housed with healthy animals																																																																																																																																																																																
2.	Housing facilities in disrepair - immediate risk		18.	Animals with immediate/serious suffering																																																																																																																																																																																
3.	Facility seriously overcrowded - needs immediate correction		19.	Animals with zoonotic diseases/public contact																																																																																																																																																																																
4.	Ventilation/Air quality - causes breathing difficulties		20.	Untreated illness/injury																																																																																																																																																																																
5.	Ambient temperature - excessive heat or cold causing risk		21.	Seriously underweight animals																																																																																																																																																																																
6.	Primary enclosures insufficient for normal posture		22.	Animals inadequately groomed - causing severe injury																																																																																																																																																																																
7.	Lack of shelter - high risk		23.	Causing unfit animals to work																																																																																																																																																																																
8.	Lighting insufficient to properly clean/inspect			Sanitation																																																																																																																																																																																
	Food		24.	Filthy-immediate risk																																																																																																																																																																																
9.	No food available		25.	No cleaning supplies and/or materials																																																																																																																																																																																
10.	Food is spoiled		26.	Waste disposal system absent or broken																																																																																																																																																																																
11.	Perishable food improperly stored - high risk		27.	Excessive vermin infestation - immediate risk																																																																																																																																																																																
	Water		28.	Excessive clutter - impossible to sanitize																																																																																																																																																																																
12.	No water available			Safety and Security																																																																																																																																																																																
13.	Water is contaminated		29.	Dangerous animals at risk of escape																																																																																																																																																																																
	Animal Safety		30.	Dangerous animals available for public contact																																																																																																																																																																																
14.	Animal injured or died due to act or omission		31.	Lack of or insufficient fire suppression system																																																																																																																																																																																
15.	Hazardous environment/equipment - high risk		32.	Predatory animals can readily gain access to animals																																																																																																																																																																																
	Euthanasia Practices		33.	Lack of Rabies Certificates - multiple violations																																																																																																																																																																																
16.	Use of non-approved methods of euthanasia		34.	Lack of Distemper vaccinations - multiple (guard dogs)																																																																																																																																																																																
<div style="border: 1px solid black; padding: 5px;"> SECTION II POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 5%;">Housing Facilities</th> <th style="width: 45%;">Violations</th> <th style="width: 5%;">Points Deducted</th> <th style="width: 45%;">Sanitation</th> </tr> <tr><td>35.</td><td>Housing facilities are in disrepair-moderate risk</td><td></td><td>58.</td><td>Animal housing cannot be readily sanitized</td></tr> <tr><td>36.</td><td>Facility is overcrowded - moderate risk</td><td></td><td>59.</td><td>Greater than 24-hour accumulation of feces/waste</td></tr> <tr><td>37.</td><td>Ventilation is stagnant - moderate risk</td><td></td><td>60.</td><td>Dirty - moderate risk</td></tr> <tr><td>38.</td><td>Ambient temperature - moderate risk</td><td></td><td>61.</td><td>Bowls/toys/equipment/materials and supplies not sanitized</td></tr> <tr><td>39.</td><td>Insufficient shelter - moderate risk</td><td></td><td>62.</td><td>Waste disposal system insufficient</td></tr> <tr><td>40.</td><td>Crates stacked in violation of Los Angeles County Code Section 10.40.010M</td><td></td><td>63.</td><td>Moderate vermin infestation</td></tr> <tr><td>41.</td><td>Lighting poor - difficult to properly clean/inspect</td><td></td><td>64.</td><td>Moderate clutter - impeding sanitation</td></tr> <tr><td>42.</td><td>Housed primarily on wire floor (H&S §122085.5)</td><td></td><td></td><td>Safety and Security</td></tr> <tr><td>43.</td><td>Kennel runs - inappropriate surfacing</td><td></td><td>65.</td><td>Non-dangerous animals at risk of escape</td></tr> <tr><td></td><td>Food</td><td></td><td>66.</td><td>Lack of emergency evacuation plan</td></tr> <tr><td>44.</td><td>Not nutritionally sufficient for age, species or other condition</td><td></td><td>67.</td><td>Predatory animals can gain access to animals - moderate risk</td></tr> <tr><td>45.</td><td>Perishable food improperly stored - moderate risk</td><td></td><td>68.</td><td>Failure to provide proper notification by traveling circus/carnival (H&S §26989.1)</td></tr> <tr><td></td><td>Water</td><td></td><td></td><td>Exercise and Socialization</td></tr> <tr><td>46.</td><td>Large number of animals without water</td><td></td><td>69.</td><td>Animals housed 24 hours/day and not exercised daily</td></tr> <tr><td>47.</td><td>Water in danger of contamination</td><td></td><td>70.</td><td>Primary enclosure insufficient for daily housing</td></tr> <tr><td>48.</td><td>Water receptacles damaged/incapable of proper disinfection</td><td></td><td>71.</td><td>Display of stereotypical cage stress behavior</td></tr> <tr><td>49.</td><td>No warm water available (grooming periods)</td><td></td><td>72.</td><td>Adequate socialization (H&S §122085(e))</td></tr> <tr><td></td><td>Animal Safety</td><td></td><td></td><td>Presence of Illegal Animals</td></tr> <tr><td>50.</td><td>Ill and/or injured animals without treatment - moderate risk</td><td></td><td>73.</td><td>Turtles with a carapace length of less than four (4) inches (CCR §2612.1)</td></tr> <tr><td>51.</td><td>Isolation facilities inadequate - moderate risk</td><td></td><td>74.</td><td>Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)</td></tr> <tr><td>52.</td><td>Moderately underweight animals</td><td></td><td>75.</td><td>Dyed live chicks, rabbits, ducklings, other fowl (PC §599)</td></tr> <tr><td>53.</td><td>Animals inadequately groomed - causing minor injury or moderate risk of injury</td><td></td><td>76.</td><td>Dogs under 8 weeks old (H&S §122155(b))</td></tr> <tr><td>54.</td><td>Animals with zoonotic disease/staff access</td><td></td><td>77.</td><td>Animals prohibited by F&W, USFWS, USDA, etc.</td></tr> <tr><td>55.</td><td>Lack of access to veterinarian with species specific training</td><td></td><td>78.</td><td>Unweaned birds who trained staff - H&S §122321</td></tr> <tr><td>56.</td><td>Hazardous environment/equipment - moderate risk</td><td></td><td></td><td></td></tr> <tr><td></td><td>Permits and Documentation</td><td></td><td></td><td></td></tr> <tr><td>57.</td><td>Lack of required permits and documentation</td><td></td><td></td><td></td></tr> </table>		Housing Facilities	Violations	Points Deducted	Sanitation	35.	Housing facilities are in disrepair-moderate risk		58.	Animal housing cannot be readily sanitized	36.	Facility is overcrowded - moderate risk		59.	Greater than 24-hour accumulation of feces/waste	37.	Ventilation is stagnant - moderate risk		60.	Dirty - moderate risk	38.	Ambient temperature - moderate risk		61.	Bowls/toys/equipment/materials and supplies not sanitized	39.	Insufficient shelter - moderate risk		62.	Waste disposal system insufficient	40.	Crates stacked in violation of Los Angeles County Code Section 10.40.010M		63.	Moderate vermin infestation	41.	Lighting poor - difficult to properly clean/inspect		64.	Moderate clutter - impeding sanitation	42.	Housed primarily on wire floor (H&S §122085.5)			Safety and Security	43.	Kennel runs - inappropriate surfacing		65.	Non-dangerous animals at risk of escape		Food		66.	Lack of emergency evacuation plan	44.	Not nutritionally sufficient for age, species or other condition		67.	Predatory animals can gain access to animals - moderate risk	45.	Perishable food improperly stored - moderate risk		68.	Failure to provide proper notification by traveling circus/carnival (H&S §26989.1)		Water			Exercise and Socialization	46.	Large number of animals without water		69.	Animals housed 24 hours/day and not exercised daily	47.	Water in danger of contamination		70.	Primary enclosure insufficient for daily housing	48.	Water receptacles damaged/incapable of proper disinfection		71.	Display of stereotypical cage stress behavior	49.	No warm water available (grooming periods)		72.	Adequate socialization (H&S §122085(e))		Animal Safety			Presence of Illegal Animals	50.	Ill and/or injured animals without treatment - moderate risk		73.	Turtles with a carapace length of less than four (4) inches (CCR §2612.1)	51.	Isolation facilities inadequate - moderate risk		74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)	52.	Moderately underweight animals		75.	Dyed live chicks, rabbits, ducklings, other fowl (PC §599)	53.	Animals inadequately groomed - causing minor injury or moderate risk of injury		76.	Dogs under 8 weeks old (H&S §122155(b))	54.	Animals with zoonotic disease/staff access		77.	Animals prohibited by F&W, USFWS, USDA, etc.	55.	Lack of access to veterinarian with species specific training		78.	Unweaned birds who trained staff - H&S §122321	56.	Hazardous environment/equipment - moderate risk					Permits and Documentation				57.	Lack of required permits and documentation				<div style="border: 1px solid black; padding: 5px;"> SECTION III POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 5%;">Housing Facilities</th> <th style="width: 45%;">Violations</th> <th style="width: 5%;">Points Deducted</th> <th style="width: 45%;">Medical Care and Health of the Animals</th> </tr> <tr><td>79.</td><td>Some disrepair - low risk</td><td></td><td>85.</td><td>Ectoparasites/Endoparasites</td></tr> <tr><td>80.</td><td>Poor ambient temperature - low risk</td><td></td><td>86.</td><td>Slightly underweight animals</td></tr> <tr><td>81.</td><td>Insufficient shelter - low risk</td><td></td><td>87.</td><td>Ill animals, minor injuries - low risk</td></tr> <tr><td>82.</td><td>Lack of nesting boards (H&S §122085(d))</td><td></td><td>88.</td><td>Failure to have present or on-call veterinarian - rodeos (PC §598.7b)</td></tr> <tr><td></td><td>Food and Water</td><td></td><td>89.</td><td>Failure to have conveyance available for injured animals</td></tr> <tr><td>83.</td><td>Uncovered food receptacles</td><td></td><td>90.</td><td>Cobwebs</td></tr> <tr><td>84.</td><td>Several animals without water and displaying thirst</td><td></td><td>91.</td><td>Some vermin infestation - low</td></tr> </table>	Housing Facilities	Violations	Points Deducted	Medical Care and Health of the Animals	79.	Some disrepair - low risk		85.	Ectoparasites/Endoparasites	80.	Poor ambient temperature - low risk		86.	Slightly underweight animals	81.	Insufficient shelter - low risk		87.	Ill animals, minor injuries - low risk	82.	Lack of nesting boards (H&S §122085(d))		88.	Failure to have present or on-call veterinarian - rodeos (PC §598.7b)		Food and Water		89.	Failure to have conveyance available for injured animals	83.	Uncovered food receptacles		90.	Cobwebs	84.	Several animals without water and displaying thirst		91.	Some vermin infestation - low
Housing Facilities	Violations	Points Deducted	Sanitation																																																																																																																																																																																	
35.	Housing facilities are in disrepair-moderate risk		58.	Animal housing cannot be readily sanitized																																																																																																																																																																																
36.	Facility is overcrowded - moderate risk		59.	Greater than 24-hour accumulation of feces/waste																																																																																																																																																																																
37.	Ventilation is stagnant - moderate risk		60.	Dirty - moderate risk																																																																																																																																																																																
38.	Ambient temperature - moderate risk		61.	Bowls/toys/equipment/materials and supplies not sanitized																																																																																																																																																																																
39.	Insufficient shelter - moderate risk		62.	Waste disposal system insufficient																																																																																																																																																																																
40.	Crates stacked in violation of Los Angeles County Code Section 10.40.010M		63.	Moderate vermin infestation																																																																																																																																																																																
41.	Lighting poor - difficult to properly clean/inspect		64.	Moderate clutter - impeding sanitation																																																																																																																																																																																
42.	Housed primarily on wire floor (H&S §122085.5)			Safety and Security																																																																																																																																																																																
43.	Kennel runs - inappropriate surfacing		65.	Non-dangerous animals at risk of escape																																																																																																																																																																																
	Food		66.	Lack of emergency evacuation plan																																																																																																																																																																																
44.	Not nutritionally sufficient for age, species or other condition		67.	Predatory animals can gain access to animals - moderate risk																																																																																																																																																																																
45.	Perishable food improperly stored - moderate risk		68.	Failure to provide proper notification by traveling circus/carnival (H&S §26989.1)																																																																																																																																																																																
	Water			Exercise and Socialization																																																																																																																																																																																
46.	Large number of animals without water		69.	Animals housed 24 hours/day and not exercised daily																																																																																																																																																																																
47.	Water in danger of contamination		70.	Primary enclosure insufficient for daily housing																																																																																																																																																																																
48.	Water receptacles damaged/incapable of proper disinfection		71.	Display of stereotypical cage stress behavior																																																																																																																																																																																
49.	No warm water available (grooming periods)		72.	Adequate socialization (H&S §122085(e))																																																																																																																																																																																
	Animal Safety			Presence of Illegal Animals																																																																																																																																																																																
50.	Ill and/or injured animals without treatment - moderate risk		73.	Turtles with a carapace length of less than four (4) inches (CCR §2612.1)																																																																																																																																																																																
51.	Isolation facilities inadequate - moderate risk		74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)																																																																																																																																																																																
52.	Moderately underweight animals		75.	Dyed live chicks, rabbits, ducklings, other fowl (PC §599)																																																																																																																																																																																
53.	Animals inadequately groomed - causing minor injury or moderate risk of injury		76.	Dogs under 8 weeks old (H&S §122155(b))																																																																																																																																																																																
54.	Animals with zoonotic disease/staff access		77.	Animals prohibited by F&W, USFWS, USDA, etc.																																																																																																																																																																																
55.	Lack of access to veterinarian with species specific training		78.	Unweaned birds who trained staff - H&S §122321																																																																																																																																																																																
56.	Hazardous environment/equipment - moderate risk																																																																																																																																																																																			
	Permits and Documentation																																																																																																																																																																																			
57.	Lack of required permits and documentation																																																																																																																																																																																			
Housing Facilities	Violations	Points Deducted	Medical Care and Health of the Animals																																																																																																																																																																																	
79.	Some disrepair - low risk		85.	Ectoparasites/Endoparasites																																																																																																																																																																																
80.	Poor ambient temperature - low risk		86.	Slightly underweight animals																																																																																																																																																																																
81.	Insufficient shelter - low risk		87.	Ill animals, minor injuries - low risk																																																																																																																																																																																
82.	Lack of nesting boards (H&S §122085(d))		88.	Failure to have present or on-call veterinarian - rodeos (PC §598.7b)																																																																																																																																																																																
	Food and Water		89.	Failure to have conveyance available for injured animals																																																																																																																																																																																
83.	Uncovered food receptacles		90.	Cobwebs																																																																																																																																																																																
84.	Several animals without water and displaying thirst		91.	Some vermin infestation - low																																																																																																																																																																																

SCORE AND GRADING									
Deductions:			Scoring			Grade Earned			
Section I:	0	→	100	Points possible		<input checked="" type="checkbox"/>	A	(90 -100 points)	
Section II:	0		- 4	Deductions			B	(80-89 points)	
Section III:	4		96	Final Score			C	(70-79 points)	
Section IV:	0						-	(less than 70 points)	
Total Deductions:	4								

DACC 14 - Forward 06/29/13 FBI

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☒ No violations observed at the time of inspection ☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A		
INSPECTION NO. 23-00056	LICENSE NO. 2167DK/40	DATE OF INSPECTION 9-17-20	
		COMPLIANCE DATE	FACILITY NAME SOUTHERN CALIFORNIA CAR ANIMAL
		FACILITY ADDRESS 35762 80TH EAST	CITY LYTLEBARK
		FACILITY OWNER JULIE MILDENBERGER	CITY LYTLEBARK
		FACILITY VETERINARIAN MISSION ANIMAL HOSPITAL	CITY LYTLEBARK
		VETERINARIAN ADDRESS 845 W. DANA	CITY LYTLEBARK
		TYPE OF FACILITY BO BO PS GP MG AM AE AD WA	LOCATION OF DRIVE FRONT ENTRANCE
		RECEIPT # 9355	GRADE CARD ISSUED X

SECTION I			
Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Medical Care and Health of the Animals	
1.	Incompatible animals housed together or in direct proximity.	17.	Isolation sick/injured animals housed with healthy animals
2.	Housing facilities in disrepair - immediate risk	18.	Animals with immediate/serious suffering
3.	Facility seriously overcrowded - needs immediate correction	19.	Animals with zoonotic diseases/public contact
4.	Ventilation/Air quality - causes breathing difficulties	20.	Untreated illness/injury
5.	Ambient temperature - excessive heat or cold causing risk	21.	Seriously underweight animals
6.	Primary enclosures insufficient for normal posture	22.	Animals inadequately groomed - causing severe injury
7.	Lack of shelter - high risk	23.	Causing unfit animals to work
8.	Lighting insufficient to properly clean/inspect	Sanitation	
Food		24.	Filthy - immediate risk
9.	No food available	25.	No cleaning supplies and/or materials
10.	Food is spoiled	26.	Waste disposal system absent or broken
11.	Perishable food improperly stored - high risk	27.	Excessive vermin infestation - immediate risk
Water		28.	Excessive clutter - impossible to sanitize
12.	No water available	Safety and Security	
13.	Water is contaminated	29.	Dangerous animals at risk of escape
Animal Safety		30.	Dangerous animals available for public contact
14.	Animal injured or died due to act or omission	31.	Lack of or insufficient fire suppression system
15.	Hazardous environment/equipment - high risk	32.	Predatory animals can readily gain access to animals
Euthanasia Practices		33.	Lack of Rabies Certificates - multiple violations
16.	Use of non-approved methods of euthanasia	34.	Lack of Distemper vaccinations - multiple (guard dogs)

SECTION II			
POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Sanitation	
35.	Housing facilities are in disrepair - moderate risk	58.	Animal housing cannot be readily sterilized
36.	Facility is overcrowded - moderate risk	59.	Greater than 24-hour accumulation of feces/waste
37.	Ventilation is adequate - moderate risk	60.	Dirty - moderate risk
38.	Ambient temperature - moderate risk	61.	Bowls/toys/equipment/materials and supplies not sanitized
39.	Insufficient shelter - moderate risk	62.	Waste disposal system insufficient
40.	Crates stacked in violation of Los Angeles County Code Section 10.40.010M	63.	Moderate vermin infestation
41.	Lighting poor - difficult to properly clean/inspect	64.	Moderate clutter - impeding sanitation
42.	Housed primarily on wire floor (H&S §122065.6)	Safety and Security	
43.	Kennel runs - inappropriate surfacing	65.	Non-dangerous animals at risk of escape
Food		66.	Lack of emergency evacuation plan
44.	Not nutritionally sufficient for age, species or other condition	67.	Predatory animals can gain access to animals - moderate risk
45.	Perishable food improperly stored - moderate risk	68.	Failure to provide proper notification by traveling circus/carnival (H&S §25989.1)
Water		Exercise and Socialization	
46.	Large number of animals without water	69.	Animals housed 24 hours/day and not exercised daily
47.	Water in danger of contamination	70.	Primary enclosure insufficient for daily housing
48.	Water receptacles damaged/incapable of proper disinfection	71.	Display of stereotypical cage stress behavior
49.	No warm water available (grooming persons)	72.	Adequate socialization (H&S §122065(e))
Animal Safety		Presence of Illegal Animals	
50.	If and/or injured animals without treatment - moderate risk	73.	Turtles with a carapace length of less than four (4) inches (CCR §2612.1)
51.	Isolation facilities inadequate - moderate risk	74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)
52.	Moderately underweight animals	75.	Dyed live chicks, rabbits, ducklings, other fowl (PC §599)
53.	Animals inadequately groomed - causing minor injury or moderate risk of injury	76.	Dogs under 8 weeks old (H&S §122165(b))
54.	Animals with zoonotic diseases/staff access	77.	Animals prohibited by F&W, USFWS, USDA, etc.
55.	Lack of access to veterinarian with species specific training	78.	Unweaned birds w/o trained staff - H&S §122321
Permits and Documentation			
57.	Lack of required permits and documentation		

SECTION III			
POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Medical Care and Health of the Animals	
79.	Some disrepair - low risk	85.	Ectoparasites/Endoparasites
80.	Poor ambient temperature - low risk	86.	Slightly underweight animals
81.	Insufficient shelter - low risk	87.	If animals, minor injuries - low risk
82.	Lack of resting boards (H&S §122065(d))	88.	Failure to have present or on-call veterinarian - rodeos (PC §599.7b)
Food and Water		89.	Failure to have conveyance available for injured animals
83.	Uncovered food receptacles	90.	Cockroaches
84.	Several animals without water and displaying thirst	91.	Some vermin infestation - low

SCORE AND GRADING							
	Deductions	→	Scoring			Grade Earned	
	Section I: 0		100	Points possible		X A (90-100 points)	
	Section II: 0		- 0	Deductions		B (80-89 points)	
	Section III: 0		100	Final Score		C (70-79 points)	
	Section IV: 0					- (less than 70 points)	
	Total Deductions: 0						

[illegible]

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	--	--	--

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☐ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.



Score 96	Grade A	SECTION I Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0	
INSPECTION NO: 915/24 LICENSE NO: 2167 CK DATE OF INSPECTION: 9/15/24 COMPLIANCE DATE: FACILITY NAME: UTAH BOX CITY: UTAH BOX OWNER: JULIA MILDENTBERGER PHONE: (661) 526-1300 FAX: EMAIL ADDRESS: ZIP: 93551 ADDRESS: 35762 90th EAST ST. CITY: PAUMotu STATE: HI LOCATION OF: KENNEL ENTRANCE TYPE OF FACILITY: 60 DO PG OF ME AM AE AD WA		Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect			Medical Care and Health of the Animals 17. Isolation sick/injured animals housed with healthy animals 18. Animals with immediate/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated illness/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing undue animals to work
		Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk			Sanitation 24. Filthy - immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize
		Water 12. No water available 13. Water is contaminated			Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificate - multiple violations 34. Lack of Distemper vaccinations - multiple (guard dogs)
		Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk			
		Euthanasia Practices 16. Use of non-approved methods of euthanasia			
		SECTION II POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY			
		Housing Facilities 35. Housing facilities are in disrepair - moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Cages stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122065.5) 43. Kennel runs - inappropriate surfacing			Sanitation 58. Animal housing cannot be readily sanitized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bows/kobs/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation
		Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk			Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25889.1)
		Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors)			Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S §122065(a))
		Animal Safety 50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic diseases/self access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk			Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR §2012.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599) 75. Dried live chicks, rabbits, ducklings, other fowl (PC §599) 76. Dogs under 8 weeks old (H&S §122155(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds who trained staff - H&S §122321
Permits and Documentation 57. Lack of required permits and documentation					
SECTION III POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY					
Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of nesting boards (H&S §122065(d))			Medical Care and Health of the Animals 85. Ectoparasites/Endoparasites 86. Slightly underweight animals 87. Ill animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - moderate (PC §596.76) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low		

APPROVED: <u>(Y)</u> N	INSPECTING OFFICER: <u>G. HINOJOSA</u>	BUDGING: <u>351</u>	SUPERVISOR: <u>J. Pardofox</u>	DATE: <u>4/21/87</u>	REGULATIONS PROVIDED? <u>(Y)</u> N
------------------------	--	---------------------	--------------------------------	----------------------	------------------------------------

SECTION IV		Points Deducted: <u>0</u>	
POINT VALUE: 2 POINTS FOR VIOLATIONS IN EACH CATEGORY			
Consumer Protection (Retail Pet Sales)		Consumer Protection (Dog Breeders)	
92.	Dog/Cat Source, Age and Health Information Statement (H&S §122140)	102.	Disclosure to Purchaser (H&S §122050)
93.	Written Notice of Purchaser's Rights (H&S §122180)	103.	Records on Health, Status and Disposition of Dogs (H&S §122055)
94.	Written Records - Dog and Cat (H&S §122145)	104.	Written Notice of Purchaser's Rights (H&S §122100)
95.	Disclosure on Cage (H&S §122215)	Required Postings and Information	
96.	Information Available for Prospective Purchaser of Dogs (H&S §122220)	105.	Posting of emergency contact information (Los Angeles County Code Sec. 10.40.010E)
97.	Posting of Notice - Registration (H&S §122305, 122310)	106.	Required notice reporting information (Los Angeles County Code Sec. 10.38.010)
98.	Turtles - posted sign (CCR §2612.1)	Misc. Violations of Law	
99.	Turtles - sales slip (CCR §2612.1)	107.	Misc. violation of law - high risk (2 pts. deducted per violation of each law):
Medical Care and Health of the Animals		108.	Misc. violation of law - low risk (2 pts. deducted per law violated):
100.	Lack of rabies certificates - 3 or less dogs		
101.	Lack of distemper vaccination - 3 or less dogs (guard dogs)		

SCORE AND GRADING						
Deductions		→	Scoring		Grade Earned	
Section I:	<u>0</u>		100	Points possible	<u>X</u> A	(90-100 points)
Section II:	<u>0</u>		- 4	Deductions	B	(80-89 points)
Section III:	<u>-4</u>		96	Final Score	C	(70-79 points)
Section IV:	<u>0</u>				-	(less than 70 points)
Total Deductions:						

[illegible]

Date Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.



☒ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A		
INSPECTION NO. 173 DMK LICENSE NO. 2167 DK DATE OF INSPECTION: 9/15/2021 COMPLIANCE DATE:	EMAIL ADDRESS: PHONE: 661) 526-1300 FAX: 213 93551	GRADE/CARD SUBJECT: YES [X] NO [] RECEIPT:	CITY: PALMDALE LOCATION OF GRADE CARD: KENNEL ENTRANCE
FACILITY NAME: 50. CAL. CAT ADOPTION FACILITY ADDRESS: 35762 80th EAST ST. FACILITY OWNER (R): Julia MILDENBERGER FACILITY VETERINARIAN: Mission Animal Hospital VETERINARIAN ADDRESS: 815 West PALMDALE BL. TYPE OF FACILITY: DO PS OR WQ AM AE AD WA	CITY: LITTIEROCK OWNER PHONE:		

SECTION I		
Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0
Housing Facilities 1. Incompatible animals housed together or in direct proximity. 2. Housing facilities in disrepair - immediate risk 3. Facility seriously overcrowded - needs immediate correction 4. Ventilation/Air quality - causes breathing difficulties 5. Ambient temperature - excessive heat or cold causing risk 6. Primary enclosures insufficient for normal posture 7. Lack of shelter - high risk 8. Lighting insufficient to properly clean/inspect Food 9. No food available 10. Food is spoiled 11. Perishable food improperly stored - high risk Water 12. No water available 13. Water is contaminated Animal Safety 14. Animal injured or died due to act or omission 15. Hazardous environment/equipment - high risk Euthanasia Practices 16. Use of non-approved methods of euthanasia	Medical Care and Health of the Animals 17. Isolation sick/injured animals housed with healthy animals 18. Animals with immediate/serious suffering 19. Animals with zoonotic diseases/public contact 20. Untreated lacerations/injury 21. Seriously underweight animals 22. Animals inadequately groomed - causing severe injury 23. Causing unfit animals to work Sanitation 24. Filthy - immediate risk 25. No cleaning supplies and/or materials 26. Waste disposal system absent or broken 27. Excessive vermin infestation - immediate risk 28. Excessive clutter - impossible to sanitize Safety and Security 29. Dangerous animals at risk of escape 30. Dangerous animals available for public contact 31. Lack of or insufficient fire suppression system 32. Predatory animals can readily gain access to animals 33. Lack of Rabies Certificates - multiple violations 34. Lack of Distemper vaccinations - multiple (guard dogs)	
SECTION II		
POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0
Housing Facilities 35. Housing facilities are in disrepair - moderate risk 36. Facility is overcrowded - moderate risk 37. Ventilation is stagnant - moderate risk 38. Ambient temperature - moderate risk 39. Insufficient shelter - moderate risk 40. Crates stacked in violation of Los Angeles County Code Section 10.40.010M 41. Lighting poor - difficult to properly clean/inspect 42. Housed primarily on wire floor (H&S §122065.5) 43. Kennel runs - inappropriate surfacing Food 44. Not nutritionally sufficient for age, species or other condition 45. Perishable food improperly stored - moderate risk Water 46. Large number of animals without water 47. Water in danger of contamination 48. Water receptacles damaged/incapable of proper disinfection 49. No warm water available (grooming parlors) Animal Safety 50. Ill and/or injured animals without treatment - moderate risk 51. Isolation facilities inadequate - moderate risk 52. Moderately underweight animals 53. Animals inadequately groomed - causing minor injury or moderate risk of injury 54. Animals with zoonotic disease/hair access 55. Lack of access to veterinarian with species specific training 56. Hazardous environment/equipment - moderate risk Exercise and Socialization 57. Lack of required permits and documentation	Sanitation 58. Animal housing cannot be readily sanitized 59. Greater than 24-hour accumulation of feces/waste 60. Dirty - moderate risk 61. Bowls/food/equipment/materials and supplies not sanitized 62. Waste disposal system insufficient 63. Moderate vermin infestation 64. Moderate clutter - impeding sanitation Safety and Security 65. Non-dangerous animals at risk of escape 66. Lack of emergency evacuation plan 67. Predatory animals can gain access to animals - moderate risk 68. Failure to provide proper notification by traveling circus/carnival (H&S §25989.1) Exercise and Socialization 69. Animals housed 24 hours/day and not exercised daily 70. Primary enclosure insufficient for daily housing 71. Display of stereotypical cage stress behavior 72. Adequate socialization (H&S §122065(e)) Presence of Illegal Animals 73. Turtles with a carapace length of less than four (4) inches (CCR §2612.1) 74. Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §5599) 75. Dyed live chicks, rabbits, ducklings, other fowl (PC §5599) 76. Dogs under 8 weeks old (H&S §122155(b)) 77. Animals prohibited by F&W, USFWS, USDA, etc. 78. Unweaned birds w/ trained staff - H&S §122321	
SECTION III		
POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY		Points Deducted 0
Housing Facilities 79. Some disrepair - low risk 80. Poor ambient temperature - low risk 81. Insufficient shelter - low risk 82. Lack of resting boards (H&S §122065(d)) Food and Water 83. Uncovered food receptacles 84. Several animals without water and displaying thirst	Medical Care and Health of the Animals 85. Endoparasites/Endoparasites 86. Slightly underweight animals 87. If animals, minor injuries - low risk 88. Failure to have present or on-call veterinarian - rodeos (PC §5596.7b) 89. Failure to have conveyance available for injured animals 90. Cobwebs 91. Some vermin infestation - low	

SCORE AND GRADING						
Deductions		→	Scoring		Grade Earned	
Section I:			100	Points possible	A	(90 -100 points)
Section II:			-	Deductions	B	(80-89 points)
Section III:			100	Final Score	C	(70-79 points)
Section IV:					-	(less than 70 points)
Total Deductions:						

[illegible]

Data Violations Corrected		COUNTY OF LOS ANGELES DEPARTMENT OF ANIMAL CARE AND CONTROL ANIMAL FACILITY INSPECTION REPORT	
---------------------------	---	--	---

See attached pages for documentation as to the exact nature of the violation(s) observed at the time of inspection.

☒ No violations observed at the time of inspection☐ Complaint allegations not observed at the time of inspection.

Score 100	Grade A	INSPECTION NO. 2 Other	LICENSE NO. 2167 OK	GRADE CARD ISSUED YES
DATE OF INSPECTION: 2/2/22		COMPLIANCE DATE		
FACILITY NAME: SOUTHERN CALIFORNIA CAT ADOP.		CITY: LITTLE ROCK CA.		
FACILITY ADDRESS: 35762 80th EAST ST.		OWNER PHONE: [REDACTED]		
FACILITY OWNER (S): Julia Milckenberger		CITY: PALMDALE		
FACILITY VETERINARIAN: MISSION ANIMAL HOSPITAL		LOCATION OF GRADE CARD		
VETERINARIAN ADDRESS: 845 W. PALMDALE BL.		RECEIPTA N/A		
TYPE OF FACILITY: BO, BD, PS, GP, BG, AM, AE, AD, WA		PHONE: (661) 526-1300		
FAX: 93557		ZIP: 93557		

SECTION I			
Violations in this category pose an immediate threat to the health and safety of the animals. POINT VALUE: 11 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Medical Care and Health of the Animals	
1.	Incompatible animals housed together or in direct proximity.	17.	Isolation-pickup/injured animals housed with healthy animals
2.	Housing facilities in disrepair - immediate risk	18.	Animals with irremediable/serious suffering
3.	Facility seriously overcrowded - needs immediate correction	19.	Animals with zoonotic diseases/public contact
4.	Ventilation/Air quality - causes breathing difficulties	20.	Untreated stress/injury
5.	Ambient temperature - excessive heat or cold causing risk	21.	Seriously underweight animals
6.	Primary enclosure insufficient for normal posture	22.	Animals inadequately groomed - causing severe injury
7.	Lack of shelter - high risk	23.	Causing unfit animals to work
8.	Lighting insufficient to properly clean/inspect	Sanitation	
Food		24.	Filthy - immediate risk
9.	No food available	25.	No cleaning supplies and/or materials
10.	Food is spoiled	26.	Waste disposal system absent or broken
11.	Perishable food improperly stored - high risk	27.	Excessive vermin infestation - immediate risk
Water		28.	Excessive clutter - impossible to sanitize
12.	No water available	Safety and Security	
13.	Water is contaminated	29.	Dangerous animals at risk of escape
Animal Safety		30.	Dangerous animals available for public contact
14.	Animal injured or died due to act or omission	31.	Lack of or insufficient fire suppression system
15.	Hazardous environment/equipment - high risk	32.	Predatory animals can readily gain access to animals
Euthanasia Practices		33.	Lack of Rabies Certificates - multiple violations
16.	Use of non-approved methods of euthanasia	34.	Lack of Distemper vaccinations - multiple (guard dogs)
SECTION II			
POINT VALUE: 6 POINTS FOR VIOLATIONS IN EACH CATEGORY			Points Deducted 0
Housing Facilities		Sanitation	
35.	Housing facilities are in disrepair - moderate risk	58.	Animals housing cannot be readily sanitized
36.	Facility is overcrowded - moderate risk	59.	Greater than 24-hour accumulation of feces/waste
37.	Ventilation is stagnant - moderate risk	60.	Dirt - moderate risk
38.	Ambient temperature - moderate risk	61.	Bowls/toys/equipment/materials and supplies not sanitized
39.	Insufficient shelter - moderate risk	62.	Waste disposal system insufficient
40.	Cages stacked in violation of Los Angeles County Code Section 10.40.010M	63.	Moderate vermin infestation
41.	Lighting poor - difficult to properly clean/inspect	64.	Moderate clutter - impacting sanitation
42.	Housed primarily on wire floor (H&S §122085.5)	Safety and Security	
43.	Kernel runs - inappropriate surfacing	65.	Non-dangerous animals at risk of escape
Food		66.	Lack of emergency evacuation plan
44.	Not nutritionally sufficient for age, species or other condition	67.	Predatory animals can gain access to animals - moderate risk
45.	Perishable food improperly stored - moderate risk	68.	Failure to provide proper notification by traveling circus/carnival (H&S §25989.1)
Water		Exercise and Socialization	
46.	Large number of animals without water	69.	Animals housed 24 hours/day and not exercised daily
47.	Water in danger of contamination	70.	Primary enclosure insufficient for daily housing
48.	Water receptacles damaged/incapable of proper disinfection	71.	Display of stereotypical cage stress behavior
49.	No warm water available (grooming parlors)	72.	Adequate socialization (H&S §122085(d))
Animal Safety		Presence of Illegal Animals	
50.	Ill and/or injured animals without treatment - moderate risk	73.	Turtles with a carapace length of less than four (4) inches (CCR §2612.1)
51.	Isolation facilities inadequate - moderate risk	74.	Sale or gift of live chicks, rabbits, ducklings or other fowl (PC §599)
52.	Moderately underweight animals	75.	Dyed live chicks, rabbits, ducklings, other fowl (PC §599)
53.	Animals inadequately groomed - causing minor injury or moderate risk of injury	76.	Dogs under 8 weeks old (H&S §122155(c))
54.	Animals with zoonotic disease/staff access	77.	Animals prohibited by F&W, USFWS, USDA, etc.
55.	Lack of access to veterinarian with species specific training	78.	Unweaned birds who trained staff - H&S §122321
56.	Hazardous environment/equipment - moderate risk	Permits and Documentation	
Permits and Documentation		POINT VALUE: 4 POINTS FOR VIOLATIONS IN EACH CATEGORY	
57.	Lack of required permits and documentation	Points Deducted 0	
Housing Facilities		Medical Care and Health of the Animals	
79.	Some disrepair - low risk	85.	Ectoparasites/Endoparasites
80.	Poor ambient temperature - low risk	86.	Slightly underweight animals
81.	Insufficient shelter - low risk	87.	Ill animals, minor injuries - low risk
82.	Lack of resting boards (H&S §122065(d))	88.	Failure to have present or on-call veterinarian - rodents (PC §596.7b)
Food and Water		89.	Failure to have conveyance available for injured animals
83.	Uncovered food receptacles	90.	Cobwebs
84.	Several animals without water and displaying thirst	91.	Some vermin infestation - low

SCORE AND GRADING						
Deductions		→	Scoring		Grade Earned	
Section I:	0		100	Points possible	X A	(90-100 points)
Section II:	0		- 0	Deductions	B	(80-89 points)
Section III:	0		100	Final Score	C	(70-79 points)
Section IV:	0				-	(less than 70 points)
Total Deductions:	0					

[illegible]

EXHIBIT 3

Marla Tauscher

From: Lisa Eldridge <LEldridge@animalcare.lacounty.gov>
Sent: Tuesday, October 18, 2022 12:55 PM
To: Marla Tauscher
Cc: Harold Holmes
Subject: Re: SCCA Permit

Hello Marla,

I apologize for the delay, our business license inspectors are backlogged and we don't anticipate being out for several weeks. I apologize for the inconvenience.

Lisa Eldridge
County of Los Angeles
DACC - Public Safety Division Manager
31044 Charlie Canyon Road
Castaic, Ca 91384
661-257-3191
Sent from [Outlook Mobile](#)

From: Harold Holmes <HHolmes@animalcare.lacounty.gov>
Sent: Tuesday, October 18, 2022 12:49 PM
To: Marla Tauscher <marla@attymat.com>
Cc: Lisa Eldridge <LEldridge@animalcare.lacounty.gov>
Subject: RE: SCCA Permit

Good afternoon Ms. Tauscher,

I am copying Lisa Eldridge on this response because she will better be able to answer your question and make arrangements to move things along. Thank you for your understanding.

Sincerely,

Harold W. Holmes
He, him, his
Executive Assistant
County of Los Angeles
Department of Animal Care and Control
5898 Cherry Avenue
Long Beach, CA 90805
Tel (562)256-1362/Fax(562)422-3408
hholmes@animalcare.lacounty.gov





Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient(s), or designated agent, please contact the sender by reply e-mail and destroy all copies of the original e-mail.

From: Marla Tauscher <marla@attymat.com>
Sent: Tuesday, October 18, 2022 11:44 AM
To: Harold Holmes <HHolmes@animalcare.lacounty.gov>
Subject: SCCA Permit

CAUTION: External Email. Proceed Responsibly.

Hi Harold,

My client, Julia Mildenerger, had a hearing with you and Lisa Eldridge and me on April 26, 2022. We agreed that LADACC would conduct their inspections on Wednesdays or Fridays so that Ms. Mildenerger could make sure she is there when officers arrive. She has paid the annual renewal fee for her kennel permit as of September 2, 2022, but there has been no permit issued, because no one has come to conduct an inspection or contacted her about it.

She is available on Wednesdays and Fridays and would like to have the inspection done so she doesn't have to wait around on those days indefinitely. Is there a way to get the inspection done and the permit reissued?

Thanks,

Marla

*Marla Tauscher
Attorney at Law
225 S. Lake Ave., Ste. 300
Pasadena, CA 91101*

*Phone: (626) 345-5777
Cell: (760) 534-3143
e-Fax: (760) 444-2742
www.attymat.com*

This message and any files transmitted with it are confidential and may contain attorney-client privileged information. These materials are for the sole use of the intended recipient. If you are not the intended recipient, any use, distribution, or disclosure of this transmission or any information contained therein is prohibited. If you have received this message in error, please notify the sender immediately.

EXHIBIT 4

SW No. _____

STATE OF CALIFORNIA - COUNTY OF LOS ANGELES
SEARCH WARRANT AND AFFIDAVIT
(AFFIDAVIT)

Animal Control Officer II, Bethany Estes, swears under oath that the facts expressed by her in this Search Warrant and Affidavit and the attached and incorporated **Statement of Probable Cause**, are true and that based thereon she has probable cause to believe and does believe that the property described below is lawfully property to be seized pursuant to Penal Code Section 1524, as indicated below, and is now located at the locations set forth below. Wherefore, affiant requests that this Search Warrant be issued.

(Signature of Affiant)

NIGHT SEARCH REQUESTED: Yes () No (X)

HOBBS SEALING REQUESTED: (X) Yes () No

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY LOS ANGELES COUNTY SHERIFF DEPARTMENT, POLICE OFFICER, PEACE OFFICER, HUMANE OFFICER, ANIMAL CONTROL OFFICER OR REPRESENTATIVE/EMPLOYEE IN THE COUNTY OF LOS ANGELES: proof by affidavit having been made before me by Animal Control Officer II, Bethany Estes, that there is probable cause to believe that the property described herein may be found at the locations set forth herein and that is lawfully property to be seized pursuant to Penal Code Section 1524 as indicated below by "X" (s) in that it:

- _____ was stolen or embezzled
- _____ was used as the means of committing a felony
- X is possessed by a person with the intent to use it as a means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery
- X tends to show that a felony has been committed or that a particular person has committed a felony
- _____ it tends to show that a sexual exploitation of a child in violation of Section 311.3, or depiction of sexual conduct of a person under the age of 18 years, in violation of Section 311.11, has occurred or is occurring,
- _____ there is a warrant for the person's arrest;

YOU ARE THEREFORE COMMANDED TO SEARCH:

35762 80th Street East located in the unincorporated area of Los Angeles County in Littlerock, California 93543. The location is further described as a one-story and single-family residence; with dark wooden panels with a dark trim facing West, with an approximate 6-foot light-colored wood fence surrounding the house and property, and address (35762) numbers mounted on a wood plaque on

the front of the light colored wooden gate with a black latch seen through a hole in the middle. At least three signs are posted on the wooden gate at the front of the property. One is a white with red font stating, "In Case of Emergency, please call..." the other is a white warning sign with black font and the third is a smaller yellow sign with black font. All signs are depicted in photos below.

This search is to include all rooms, attics, basements, briefcases, closets, safes, desks, refrigerators, freezers, and other parts therein, any attached or unattached garages, outbuildings, sheds, mailboxes, trash containers, cages and kennels, the surrounding grounds, file cabinets, or any storage area in or about the premises in which the property sought may be reasonably found. All parts therein and the surrounding grounds including any areas where animals may be housed and/or kept to conceal its discovery. Additionally, it is requested that all vehicles and trailers, RVs, and modular units on the properties associated with the location are to be searched. Forced entry onto the property and into all sheds, buildings, vehicles, trailers, and motorhomes and modular units is requested. It is also requested that digital photographs and video be taken of the premises.

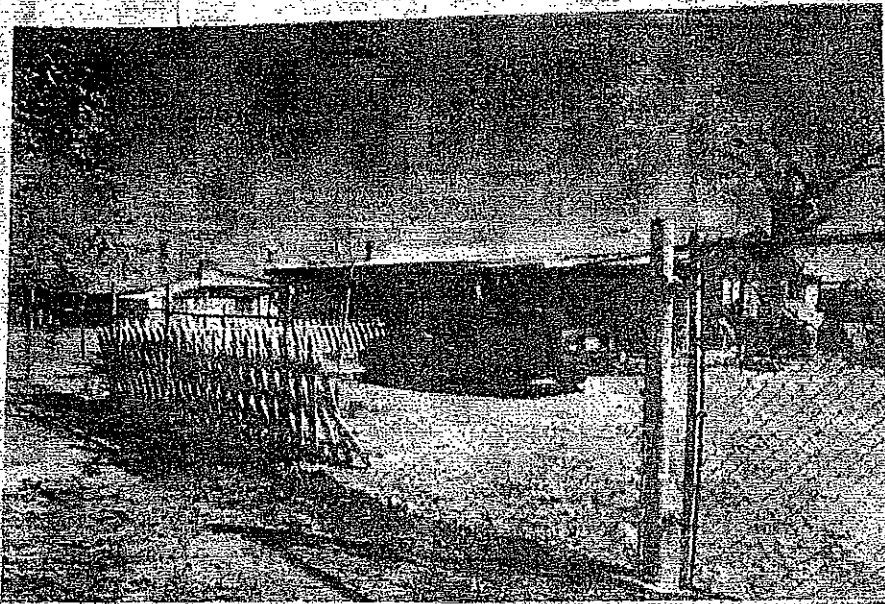
Your affiant is requesting personnel from Los Angeles County Sheriff's Department for the purpose of making entry onto the property and rendering it safe for Los Angeles County Animal Care and Control to conduct an investigation; and personnel from Los Angeles County District Attorney's office for investigative purposes.

Forced entry onto the property/ location and into the main residence, other buildings, vehicles and/ or trailers is requested and will be handled by the Los Angeles County Sheriff's Department personnel.

FOR THE FOLLOWING PROPERTY:

35762 80th street East Littlerock, CA 93543





PROPERTY TO BE SEIZED:

All animals will be seized pursuant to this warrant. The animals seized will remain in the temporary care, custody and control of the Department, pending disposition. However, if the animal owner chooses to relinquish ownership to the Department, the animal(s) will be disposed of by DACC accordingly. Additionally, all sick and injured animals will be seized, evaluated by a licensed veterinarian and if necessary, euthanized for humane reasons. The Department of Animal Care and Control (DACC) may utilize and seize any animal carriers, crates or any other item to aid in the impoundment of animals.

All papers, documents and effects tending to show dominion and control over said premises, including keys, lease, rental, or mortgage agreements, utility bills, canceled mail, prescription bottles, fingerprints, clothing, photographs, photographic negatives, image disks, memory sticks, undeveloped film, homemade videotapes, handwritings, documents and effects bearing a form of identification such as a person's name, photograph, Social Security number or driver's license number, and to view any video seized pursuant to the warrant.

Additionally, any animal medical records or other documents, such as receipts for food, veterinary care, or purchase of animal toys or paraphernalia that tend to show possession, purchase, adoption, transfer, ownership, disposal, sale, illness, injury, medical condition, vaccination, licensing, medication, treatment, birth, or death of any animal, all documents related to application or issuance of an animal facility permit, and all documents related to breeding.

All medication, including both prescription medication and non-prescription medications that are used to treat disease that afflict cats or other species of animals found during the execution of this warrant, including medications designed for use on humans if there is an indication that it/they have been used on an animal.

All computers and electronic communications devices seizure only subject to CA/ECPA warrant.

Any and all computer hardware which consists of all equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar computer impulse or data. Hardware includes (but is not limited to): any motherboards, any data-processing devices, (such as chips, memory typewriters, and self-contained "laptops" or "notebook" computers), any memory storage devices (such as fixed disks, external hard disks, floppy disk drives and diskettes, tape drives and tapes, optical storage devices and other memory storage devices), peripheral input/output devices (such as keyboards, printers, scanners, plotters, video display monitors, and optical readers), and related communication devices (such as modems, cables, and connections), recording equipment, RAM or ROM units, automatic dialers, speed dialers, programmable mechanisms, or parts that can be used to restrict access to computer hardware (such as physical keys and locks).

Any and all computer software which consists of any digital information which can be executed by a computer and any of its related components to direct the way they work, including programs to run operating systems, applications, (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters and communication programs. Software can be stored in electronic, magnetic, optical or other digital form.

Any and all computer-related documentation described as written, recorded, printed, or electronically stored material, which explains or illustrates how to configure or use computer hardware, software, or other related items.

Any and all computer passwords and other data security devices designed to restrict access to or hide computer software, documentation, or data, consisting of hardware, software, or other programming codes. Data security hardware may include encryption device, chips, and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

Your affiant also requests a 60 day "return to search warrant" for the purpose of making evidence images of any electronic media seized pursuant to this warrant. All electronic media will be transported to the Southern California High Technology Task Force and/or the Los Angeles County Sheriff's Department's Computer Forensics Unit where it will be handled, imaged and examined within currently accepted computer forensic practices to retain the integrity of the information as evidence. Due to the demand of the SCHTTF/LASD services within the law enforcement community, there may be backlog of cases precipitating a delay of up to 60 days before the electronic evidence may be imaged and examination commence.

AND TO SEIZE IT IF FOUND and bring it forth before me, or this court, at the courthouse of this court. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 25th day of Oct. 2022 9:35 a.m. p.m. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

NIGHT SEARCH APPROVED: Yes () No (X) No
HORRIS SEALING APPROVED: Yes (X) No () No

(Signature of Magistrate)

Given under my hand and dated
This 25th day of Oct. 2022

9:35 a.m. p.m.



ROBERT G. CHU

(Signature of Magistrate)

Judge of the Superior Court

(Judicial District)

Walt D. [Signature]

1 BOX MISC PAPERWORK

Approx 199 LIVE CATS

Approx 7 DEAD ANIMALS

2 TORTOISES

1 CHINCHILLA

Approx 35 DOGS

EXHIBIT 5

3:41



Done

6 of 6

FOR IMMEDIATE RELEASE

October 31, 2022

Contact: Don Belton, Public Information Officer

Media Line: (562) 728-4644; PIO@animalcare.lacounty.gov**ANIMAL SEIZURE AT 501C3 ANIMAL FACILITY IN LITTLEROCK, CA**

On Wednesday, October 26, 2022, the Los Angeles County Department of Animal Care and Control (DACC) served a search warrant at an animal rescue facility in Littlerock, CA resulting to the confiscation of 195 cats and 43 dogs, including six dead animals. The warrant was issued due to the animal rescue organization's non-compliance with State and County animal care laws; exceeding animal limitation requirements, and failure to provide proper medical care for animals.

DACC's Major Case Unit (MCU) partnered with the Los Angeles Sheriff's Department (LASD) Community Partnership Bureau and the District Attorney's (DA) Office for this investigation. DACC had a team of 25 responders, including animal cruelty investigators and a forensics veterinarian. Findings in the facility included animals in inhumane living conditions and evidence of the practice of medical care without a veterinary license. All animals seized were distributed among DACC's seven animal care centers, where they are undergoing evaluation and treatment while the investigative reports are prepared for the DA. These animals will not be made available at this time.

"Providing safe and humane care to animals is required by local and State law," said Marcia Mayeda, Director. "Our department stands committed to protecting animals and ensuring they receive the care they need."

Animal rescue organizations are responsible for providing the basic needs for housing, nutrition, and health of all animals in their care. The quality of life of the animals must be a priority. Los Angeles County residents are asked to report suspected cases of animal neglect by calling DACC at (310) 523-9566.



EXHIBIT 6

765.4

ENROLLED BILL REPORT

DEPARTMENT OF FOOD AND AGRICULTURE

BILL NUMBER

AB 35

AUTHOR

Filante

SUMMARY

Assembly Bill 35, sponsored by Assemblyman Filante, is identical to Assembly Bill 685 as amended August 27, 1990 during the previous session, with the exception of an urgency clause and the implementation date of January 1, 1991.

Existing law establishes misdemeanor penalties for certain animal keepers, drivers, or owners who do not properly care or provide for the needs of their animals. Existing law specifies various powers and duties of certain local officers relating to care and disposition of neglected, abused, or disabled animals.

This bill would recast certain provisions for the care and disposition of these animals and specifically provides for hearings in which the owner or keeper of the animal may challenge seizure or impoundment and the resulting costs of these services.

A. Impact Assessment

The bill imposes a state-mandated local program by requiring local officers to comply with notification requirements and hearing procedures.

B. Arguments Pro and ConPro

1. The provisions for notification and hearing supports due process and is desirable to prevent unfair seizure.

Con

1. The interpretation of "proper care and attention" can vary so widely that unreasonable and unfair seizure can easily occur.

C. Recommendation

It is recommended that AB 35 be signed by the Governor.

HP *Sandhi*
 Vote: Ayes 70 Ayes 38
 Assembly Noes 2 Senate Noes 0

RECOMMENDATION:

☒ SIGN☐ VETO

DEFER TO

DEPARTMENT DIRECTOR

DATE

1/6/91

Robert C. Ford
 Contact: L. C. Vanderwagen (916) 445-4191

GCBF cl 4
AB35.1991

SECRETARY OF STATE, DEBRA BOWEN
The Original of This Document is in
CALIFORNIA STATE ARCHIVES
1020 "O" STREET
SACRAMENTO, CA 95814

EXHIBIT 7

Marla Tauscher

From: Lisa Eldridge <LEldridge@animalcare.lacounty.gov>
Sent: Tuesday, May 3, 2022 11:57 AM
To: Marla Tauscher
Cc: Harold Holmes; Raul Rodriguez; Jaime Palafox; Tony Apodaca; Esequiel Morales
Subject: FW: Follow up to Meeting last Tuesday

Hello Marla,

Harold has shared your communication with me and requested I respond. The DNA on SCCAT has been removed and the OTC issued to reduce the number of cats can be disregarded.

Lisa E.

----- Forwarded message -----

From: Marla Tauscher <marla@attymat.com>
Date: Mon, May 2, 2022 at 12:01 PM
Subject: Follow up to Meeting last Tuesday
To: Harold Holmes <haroldwholmes@gmail.com>

Hi Harold,

I wanted to follow up with you about a few things from the meeting last Tuesday with So Cal Cat Adoption Tails:

1. You mentioned that the department would vacate the *Order to Comply* requiring my client to reduce the number of cats from 115 to 75. Can we get that in writing?
2. When will the DNA be removed from my client? I cant remember the name of the officer who unilaterally decided to put her on the DNA list preemptively, but that's not the way it's done.
3. My client would like the necropsy results from the cat that was found at her facility. I believe it was in February 2022.

Thanks,

Marla

Marla Tauscher

Attorney at Law

225 S. Lake Ave., Ste. 300

Pasadena, CA 91101

Phone: (626) 345-5777

Cell: (760) 534-3143

e-Fax: (760) 444-2742

www.attymat.com

This message and any files transmitted with it are confidential and may contain attorney-client privileged information. These materials are for the sole use of the intended recipient. If you are not the intended recipient, any use, distribution, or disclosure of this transmission or any information contained therein is prohibited. If you have received this message in error, please notify the sender immediately.

DECLARATION OF JULIA MILDENBERGER

I, Julia Mildenerger, declare under oath:

1. I am the founder of Southern California Cat Adoption Tails (hereinafter "SCCAT"), a non-profit animal rescue organization that I started in 2006.

2. I have first-hand, personal knowledge of the facts set forth in this declaration, and if called and sworn as a witness, I would testify competently to them.

3. The documents in Exhibit 1 to the Petition and Complaint, kennel permits, are true and correct copies of the documents issued to me by LADAC in September 2021 and valid to September 2, 2022.

4. The documents in Exhibit 2 to the Petition and Complaint, inspection reports, are true and correct copies of inspection reports from 2016 to 2022, issued to me following each annual inspection of my animal facilities by LADAC personnel. Annual inspections by LADAC personnel are a condition of issuance and renewal of my kennel permits.

5. The document in Exhibit 4 to the Petition and Complaint, the search warrant, is a true and correct copy of the search warrant that I photographed after it was handed to me by someone who did not identify themselves, as LADAC personnel were leaving my property late in the afternoon on October 26, 2022. Prior to that, I had no knowledge of the existence of a search warrant.

6. The document in Exhibit 5 to the Petition and Complaint, the press release, is a true and correct copy of the press release issued by LADAC on October 31, 2022. I obtained a copy of the press from a volunteer for SCCAT who received it as part of a mass emailing to the public by LADAC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 3rd of November, 2022 at Littlerock, California.


Julia Mildenerger

DECLARATION OF JULIA MILDENBERGER ISO VERIFIED PETITION FOR WRIT OF MANDATE
AND COMPLAINT FOR DAMAGES PURSUANT TO 42 U.S.C. §1983

DECLARATION OF MARLA TAUSCHER

I, Marla Tauscher, declare under oath:

1. I am an attorney duly licensed and admitted to practice law in the State of California.

2. I am the attorney of record for Petitioner/Plaintiff Julia Mildenerger in the present case.

3. I have first-hand, personal knowledge of the facts set forth in this declaration, and if called and sworn as a witness, I would testify competently to them.

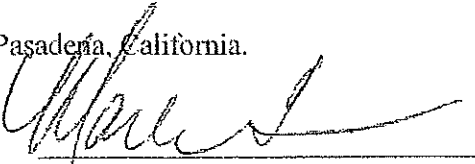
4. The document in Exhibit 3 to the Petition and Complaint, emails, is a true and correct copy of an October 18, 2022 email exchange between myself and Lisa Eldridge (hereinafter "Eldridge") of Los Angeles County Department of Animal Control (hereinafter "LADAC") regarding the annual inspection of Petitioner/Plaintiff's animal facility.

5. The document in Exhibit 6 to the Petition and Complaint, an enrolled bill report from a 1990 California State Assembly Bill (AB35), is a true and correct copy of a certified copy of a portion of the legislative history of *California Penal Code §597.1* that I obtained in January 2014 by requesting the legislative history from the California State Archives.

6. The document in Exhibit 7 to the Petition and Complaint, emails, is a true and correct copy of a May 3, 2022 email exchange between myself and Eldridge regarding LADAC vacation of a previously issued order to comply to Petitioner/Plaintiff.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 3rd of November at Pasadena, California.


Marla Tauscher

DECLARATION OF MARLA TAUSCHER ISO WRIT OF MANDATE AND
COMPLAINT FOR DAMAGES PURSUANT TO 42 U.S.C. §1983

Exhibit B

Electronic filing of this document is not required. Case 2:23-cv-00056 Document 1-1 Filed 01/05/23 Page 80 of 140 Page ID #:82

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 MARLA TAUSCHER, State Bar No. 259630, County of Los Angeles on 12/01/2022 02:58 PM Sherri R. Carter, Executive Officer/Clerk of Court or Deputy Clerk
 225 S. Lake Ave., Ste. 300, Pasadena, CA 91101
 22STCP04242

TELEPHONE NO.: (626) 345-5777 FAX NO. (Optional): (760) 444-2742
 E-MAIL ADDRESS: marla@attymat.com
 ATTORNEY FOR (Name): JULIA MILDENBERGER

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
 STREET ADDRESS: 111 N. Hill Street
 MAILING ADDRESS: 111 N. Hill Street
 CITY AND ZIP CODE: Los Angeles 90012
 BRANCH NAME: Stanley Mosk Courthouse

CASE NAME: JULIA MILDENBERGER v. COUNTY OF LOS ANGELES

CIVIL CASE COVER SHEET		Complex Case Designation	CASE NUMBER:
<input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000)	<input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	22STCP04242
			JUDGE: DEPT.:

Items 1–6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input checked="" type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
--	---	--

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): Writ of mandate; violation of CA Constitution; 42 USC 1983; Injunctive Relief CCP 526

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)
 Date: 11/4/2022
 MARLA TAUSCHER

(TYPE OR PRINT NAME)

NOTICE

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint RICO (27)

Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

Exhibit C

22STCP04242

SHORT TITLE

JULIA MILDENBERGER v. COUNTY OF LOS ANGELES

CASE NUMBER

22STCP04242

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION**(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Courthouse Location (Column C)

1. Class Actions must be filed in the Stanley Mosk Courthouse, Central District.	7. Location where petitioner resides.
2. Permissive filing in Central District.	8. Location wherein defendant/respondent functions wholly.
3. Location where cause of action arose.	9. Location where one or more of the parties reside.
4. Location where bodily injury, death or damage occurred.	10. Location of Labor Commissioner Office.
5. Location where performance required, or defendant resides.	11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection).
6. Location of property or permanently garaged vehicle.	

	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Auto Tort	Auto (22)	<input type="checkbox"/> 2201 Motor Vehicle – Personal Injury/Property Damage/Wrongful Death	1, 4
	Uninsured Motorist (46)	<input type="checkbox"/> 4601 Uninsured Motorist – Personal Injury/Property Damage/Wrongful Death	1, 4
Other Personal Injury/ Property Damage/ Wrongful Death	Other Personal Injury/ Property Damage/ Wrongful Death (23)	<input type="checkbox"/> 2301 Premise Liability (e.g., dangerous conditions of property, slip/trip and fall, dog attack, etc.)	1, 4
		<input type="checkbox"/> 2302 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, battery, vandalism, etc.)	1, 4
		<input type="checkbox"/> 2303 Intentional Infliction of Emotional Distress	1, 4
		<input type="checkbox"/> 2304 Other Personal Injury/Property Damage/Wrongful Death	1, 4
		<input type="checkbox"/> 2305 Elder/Dependent Adult Abuse/Claims Against Skilled Nursing Facility	1, 4
		<input type="checkbox"/> 2306 Intentional Conduct – Sexual Abuse Case (in any form)	1, 4

SHORT TITLE JULIA MILDENBERGER v. COUNTY OF LOS ANGELES	CASE NUMBER
--	-------------

	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
		<input type="checkbox"/> 2307 Construction Accidents	1, 4
		<input type="checkbox"/> 2308 Landlord – Tenant Habitability (e.g., bed bugs, mold, etc.)	1, 4
Other Personal Injury/ Property Damage/ Wrongful Death	Product Liability (24)	<input type="checkbox"/> 2401 Product Liability (not asbestos or toxic/ environmental)	1, 4
		<input type="checkbox"/> 2402 Product Liability – Song-Beverly Consumer Warranty Act (CA Civil Code §§1790-1795.8) (Lemon Law)	1, 3, 5
	Medical Malpractice (45)	<input type="checkbox"/> 4501 Medical Malpractice – Physicians & Surgeons	1, 4
		<input type="checkbox"/> 4502 Other Professional Health Care Malpractice	1, 4
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> 0701 Other Commercial/Business Tort (not fraud or breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> 0801 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> 1301 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> 1601 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> 2501 Legal Malpractice	1, 2, 3
		<input type="checkbox"/> 2502 Other Professional Malpractice (not medical or legal)	1, 2, 3
	Other (35)	<input type="checkbox"/> 3501 Other Non-Personal Injury/Property Damage Tort	1, 2, 3
Employment	Wrongful Termination (36)	<input type="checkbox"/> 3601 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> 1501 Other Employment Complaint Case	1, 2, 3
		<input type="checkbox"/> 1502 Labor Commissioner Appeals	10
Contract	Breach of Contract / Warranty (06) (not insurance)	<input type="checkbox"/> 0601 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
		<input type="checkbox"/> 0602 Contract/Warranty Breach – Seller Plaintiff (no fraud/negligence)	2, 5
		<input type="checkbox"/> 0603 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
		<input type="checkbox"/> 0604 Other Breach of Contract/Warranty (no fraud/ negligence)	1, 2, 5
		<input type="checkbox"/> 0605 Breach of Rental/Lease Contract (COVID-19 Rental Debt)	2, 5
	Collections (09)	<input type="checkbox"/> 0901 Collections Case – Seller Plaintiff	5, 6, 11
		<input type="checkbox"/> 0902 Other Promissory Note/Collections Case	5, 11
		<input type="checkbox"/> 0903 Collections Case – Purchased Debt (charged off consumer debt purchased on or after January 1, 2014)	5, 6, 11
		<input type="checkbox"/> 0904 Collections Case – COVID-19 Rental Debt	5, 11
	Insurance Coverage (18)	<input type="checkbox"/> 1801 Insurance Coverage (not complex)	1, 2, 5, 8

SHORT TITLE JULIA MILDENBERGER v. COUNTY OF LOS ANGELES	CASE NUMBER
--	-------------

	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Contract (Continued)	Other Contract (37)	<input type="checkbox"/> 3701 Contractual Fraud	1, 2, 3, 5
		<input type="checkbox"/> 3702 Tortious Interference	1, 2, 3, 5
		<input type="checkbox"/> 3703 Other Contract Dispute (not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9
Real Property	Eminent Domain/ Inverse Condemnation (14)	<input type="checkbox"/> 1401 Eminent Domain/Condemnation Number of Parcels _____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> 3301 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> 2601 Mortgage Foreclosure	2, 6
		<input type="checkbox"/> 2602 Quiet Title	2, 6
		<input type="checkbox"/> 2603 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6
Unlawful Detainer	Unlawful Detainer – Commercial (31)	<input type="checkbox"/> 3101 Unlawful Detainer – Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer – Residential (32)	<input type="checkbox"/> 3201 Unlawful Detainer – Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer – Post Foreclosure (34)	<input type="checkbox"/> 3401 Unlawful Detainer – Post Foreclosure	2, 6, 11
	Unlawful Detainer – Drugs (38)	<input type="checkbox"/> 3801 Unlawful Detainer – Drugs	2, 6, 11
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> 0501 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> 1101 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> 0201 Writ – Administrative Mandamus	2, 8
		<input type="checkbox"/> 0202 Writ – Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> 0203 Writ – Other Limited Court Case Review	2
	Other Judicial Review (39)	<input checked="" type="checkbox"/> 3901 Other Writ/Judicial Review	2, 8
		<input type="checkbox"/> 3902 Administrative Hearing	2, 8
		<input type="checkbox"/> 3903 Parking Appeal	2, 8
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> 0301 Antitrust/Trade Regulation	1, 2, 8
	Asbestos (04)	<input type="checkbox"/> 0401 Asbestos Property Damage	1, 11
		<input type="checkbox"/> 0402 Asbestos Personal Injury/Wrongful Death	1, 11

SHORT TITLE JULIA MILDENBERGER v. COUNTY OF LOS ANGELES	CASE NUMBER
--	-------------

	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Provisionally Complex Litigation (Continued)	Construction Defect (10)	<input type="checkbox"/> 1001 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> 4001 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> 2801 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> 3001 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> 4101 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> 2001 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> 2002 Abstract of Judgment	2, 6
		<input type="checkbox"/> 2003 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> 2004 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> 2005 Petition/Certificate for Entry of Judgment Unpaid Tax	2, 8
		<input type="checkbox"/> 2006 Other Enforcement of Judgment Case	2, 8, 9
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> 2701 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (not specified above) (42)	<input type="checkbox"/> 4201 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> 4202 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> 4203 Other Commercial Complaint Case (non-tort/noncomplex)	1, 2, 8
		<input type="checkbox"/> 4304 Other Civil Complaint (non-tort/non-complex)	1, 2, 8
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> 2101 Partnership and Corporation Governance Case	2, 8
	Other Petitions (not specified above) (43)	<input type="checkbox"/> 4301 Civil Harassment with Damages	2, 3, 9
		<input type="checkbox"/> 4302 Workplace Harassment with Damages	2, 3, 9
		<input type="checkbox"/> 4303 Elder/Dependent Adult Abuse Case with Damages	2, 3, 9
		<input type="checkbox"/> 4304 Election Contest	2
		<input type="checkbox"/> 4305 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> 4306 Petition for Relief from Late Claim Law	2, 3, 8
		<input type="checkbox"/> 4307 Other Civil Petition	2, 9

SHORT TITLE JULIA MILDENBERGER v. COUNTY OF LOS ANGELES	CASE NUMBER
--	-------------

Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address, which is the basis for the filing location including zip code. (No address required for class action cases.)

REASON: <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input checked="" type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11			ADDRESS: 35762 80th Street East
CITY: Littlerock	STATE: CA	ZIP CODE: 93534	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code of Civ. Proc., 392 et seq., and LASC Local Rule 2.3(a)(1)(E)]

Dated: 11/04/2022


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form LASC CIV 109 (10/22).
5. Payment in full of the filing fee, unless there is a court order for waiver, partial or schedule payments.
6. A signed order appointing a Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court to issue a Summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the Summons and Complaint, or other initiating pleading in the case.

Exhibit D

SUM-100

SUMMONS
(CITACION JUDICIAL)FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)**NOTICE TO DEFENDANT:**
(AVISO AL DEMANDADO):

COUNTY OF LOS ANGELES; and DOES 1 through 50, inclusive

YOU ARE BEING SUED BY PLAINTIFF:**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

JULIA MILDENBERGER, in her individual capacity and in her capacity as CEO of SOUTHERN CALIFORNIA CAT ADOPTION TAILS; a California nonprofit corporation

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is: Stanley Mosk Courthouse
(El nombre y dirección de la corte es):

111 N. Hill Street, Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):

22STCP04242

Sherri R. Carter Executive Officer / Clerk of Court

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Marla Tauscher, 225 S. Lake Ave., Ste. 300, Pasadena, CA 91101 Telephone: (626) 345-5777

DATE: 12/01/2022
(Fecha)

Clerk, by

(Secretario)

R. Perez

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

**NOTICE TO THE PERSON SERVED: You are served**

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):

- ☒ on behalf of (specify): County of Los Angeles

under: ☐ CCP 416.10 (corporation)☐ CCP 416.20 (defunct corporation)☐ CCP 416.40 (association or partnership)☒ other (specify): CCP 416.50☐ CCP 416.60 (minor)☐ CCP 416.70 (conservatee)☐ CCP 416.90 (authorized person)

- ☐ by personal delivery on (date):

Page 1 of 1

Exhibit E

Electronically Filed by Superior Court of California, County of Los Angeles on 12/01/2022 02:58 PM Sherri R. Carter, Executive Officer/Clerk of Court, by R. Perez, Deputy Clerk

MARLA TAUSCHER, SBN 259630
225 S. Lake Ave., Ste. 300
Pasadena, California 91101
Phone: (626) 345-5777
Fax: (760) 444-2742
e-mail: marla@attymat.com

Attorney for Petitioner/Plaintiff
JULIA MILDENBERGER

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
STANLEY MOSK COURTHOUSE**

JULIA MILDENBERGER, in her individual
capacity and in her capacity as CEO of
SOUTHERN CALIFORNIA CAT
ADOPTION TAILS; a California nonprofit
corporation,

Petitioner/Plaintiff

vs.

COUNTY OF LOS ANGELES; and DOES 1
through 50, inclusive,

Respondents/Defendants

Case No.: **22STCP04242**

REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF VERIFIED PETITION FOR
WRIT OF MANDATE AND COMPLAINT
FOR DAMAGES PURSUANT TO 42 U.S.C.
§1983

[Verified Petition for Writ of Mandate and
Complaint for Damages pursuant to 42 U.S.C.
§1983; Declaration of Marla Tauscher;
Declaration of Julia Mildenberger; and *Ex*
Parte Application for Temporary Restraining
Order filed concurrently]

Dept.:
Judge:
Hearing Date:
Hearing Time:

REQUEST FOR JUDICIAL NOTICE ISO VERIFIED PETITION FOR WRIT OF MANDATE
AND COMPLAINT FOR DAMAGES PURSUANT TO 42 U.S.C. §1983

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

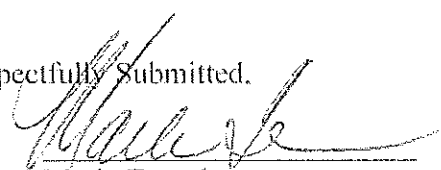
2 PLEASE TAKE NOTICE THAT pursuant to California Rules of Court, Rules 3.1113(l)
3 and 3.1306(c), and California Evidence Code Sections 450, *et seq.*, Petitioner/Plaintiff Julia
4 Mildenberger ("Petitioner/Plaintiff"), by and through her attorney of record, requests that the
5 Court take judicial notice of the following documents in support of her *Ex Parte* Non-Statutory
6 Motion for Return of Property:

- 7 1. California Penal Code §597.1;
8 2. California Business and Professions Code §4827.
9

10
11 Dated: November 3, 2022

Respectfully Submitted,

12 By:

13 
Marla Tauscher

14 Attorney for Julia Mildenberger
15
16
17
18
19
20
21
22
23
24
25
26
27
28

State of California**PENAL CODE****Section 597.1**

597.1. (a) (1) Every owner, driver, or keeper of any animal who permits the animal to be in any building, enclosure, lane, street, square, or lot of any city, county, city and county, or judicial district without proper care and attention is guilty of a misdemeanor. Any peace officer, humane society officer, or animal control officer shall take possession of the stray or abandoned animal and shall provide care and treatment for the animal until the animal is deemed to be in suitable condition to be returned to the owner. When the officer has reasonable grounds to believe that very prompt action is required to protect the health or safety of the animal or the health or safety of others, the officer shall immediately seize the animal and comply with subdivision (f). In all other cases, the officer shall comply with the provisions of subdivision (g). The full cost of caring for and treating any animal properly seized under this subdivision or pursuant to a search warrant shall constitute a lien on the animal and the animal shall not be returned to its owner until the charges are paid, if the seizure is upheld pursuant to this section.

(2) Notwithstanding any other law, if an animal control officer or humane officer, when necessary to protect the health and safety of a wild, stray, or abandoned animal or the health and safety of others, seeks to administer a tranquilizer that contains a controlled substance, as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code, to gain control of that animal, the officer may possess and administer that tranquilizer with direct or indirect supervision as determined by a licensed veterinarian, provided that the officer has met each of the following requirements:

(A) Has received training in the administration of tranquilizers from a licensed veterinarian. The training shall be approved by the California Veterinary Medical Board.

(B) Has successfully completed the firearms component of a course relating to the exercise of police powers, as set forth in Section 832.

(C) Is authorized by the officer's agency or organization to possess and administer the tranquilizer in accordance with a policy established by the agency or organization and approved by the veterinarian who obtained the controlled substance.

(D) Has successfully completed the euthanasia training set forth in Section 2039 of Title 16 of the California Code of Regulations.

(E) Has completed a state and federal fingerprinting background check and does not have any drug- or alcohol-related convictions.

(b) Every sick, disabled, infirm, or crippled animal, except a dog or cat, that is abandoned in any city, county, city and county, or judicial district may be humanely

ethanized by the officer if, after a reasonable search, no owner of the animal can be found. It shall be the duty of all peace officers, humane society officers, and animal control officers to cause the animal to be humanely euthanized or rehabilitated and placed in a suitable home on information that the animal is stray or abandoned. The officer may likewise take charge of any animal, including a dog or cat, that by reason of lameness, sickness, feebleness, or neglect, is unfit for the labor it is performing, or that in any other manner is being cruelly treated, and provide care and treatment for the animal until it is deemed to be in a suitable condition to be returned to the owner. When the officer has reasonable grounds to believe that very prompt action is required to protect the health or safety of an animal or the health or safety of others, the officer shall immediately seize the animal and comply with subdivision (f). In all other cases, the officer shall comply with subdivision (g). The full cost of caring for and treating any animal properly seized under this subdivision or pursuant to a search warrant shall constitute a lien on the animal and the animal shall not be returned to its owner until the charges are paid.

(c) (1) Any peace officer, humane society officer, or animal control officer shall convey all injured cats and dogs found without their owners in a public place directly to a veterinarian known by the officer to be a veterinarian who ordinarily treats dogs and cats for a determination of whether the animal shall be immediately and humanely euthanized or shall be hospitalized under proper care and given emergency treatment.

(2) If the owner does not redeem the animal within the locally prescribed waiting period, the veterinarian may personally perform euthanasia on the animal. If the animal is treated and recovers from its injuries, the veterinarian may keep the animal for purposes of adoption, provided the responsible animal control agency has first been contacted and has refused to take possession of the animal.

(3) Whenever any animal is transferred to a veterinarian in a clinic, such as an emergency clinic that is not in continuous operation, the veterinarian may, in turn, transfer the animal to an appropriate facility.

(4) If the veterinarian determines that the animal shall be hospitalized under proper care and given emergency treatment, the costs of any services that are provided pending the owner's inquiry to the responsible agency, department, or society shall be paid from the dog license fees, fines, and fees for impounding dogs in the city, county, or city and county in which the animal was licensed or, if the animal is unlicensed, shall be paid by the jurisdiction in which the animal was found, subject to the provision that this cost be repaid by the animal's owner. The full cost of caring for and treating any animal seized under this subdivision shall constitute a lien on the animal and the animal shall not be returned to the owner until the charges are paid. No veterinarian shall be criminally or civilly liable for any decision that the veterinarian makes or for services that the veterinarian provides pursuant to this subdivision.

(d) An animal control agency that takes possession of an animal pursuant to subdivision (c) shall keep records of the whereabouts of the animal from the time of possession to the end of the animal's impoundment, and those records shall be available for inspection by the public upon request for three years after the date the animal's impoundment ended.

(e) Notwithstanding any other provision of this section, any peace officer, humane society officer, or any animal control officer may, with the approval of the officer's immediate superior, humanely euthanize any stray or abandoned animal in the field in any case where the animal is too severely injured to move or where a veterinarian is not available and it would be more humane to euthanize the animal.

(f) Whenever an officer authorized under this section seizes or impounds an animal based on a reasonable belief that prompt action is required to protect the health or safety of the animal or the health or safety of others, the officer shall, before the commencement of any criminal proceedings authorized by this section, provide the owner or keeper of the animal, if known or ascertainable after reasonable investigation, with the opportunity for a postseizure hearing to determine the validity of the seizure or impoundment, or both.

(1) The agency shall cause a notice to be affixed to a conspicuous place where the animal was situated or personally deliver a notice of the seizure or impoundment, or both, to the owner or keeper within 48 hours, excluding weekends and holidays. The notice shall include all of the following:

(A) The name, business address, and telephone number of the officer providing the notice.

(B) A description of the animal seized, including any identification upon the animal.

(C) The authority and purpose for the seizure or impoundment, including the time, place, and circumstances under which the animal was seized.

(D) A statement that, in order to receive a postseizure hearing, the owner or person authorized to keep the animal, or their agent, shall request the hearing by signing and returning an enclosed declaration of ownership or right to keep the animal to the agency providing the notice within 10 days, including weekends and holidays, of the date of the notice. The declaration may be returned by personal delivery or mail.

(E) A statement that the full cost of caring for and treating any animal properly seized under this section is a lien on the animal and that the animal shall not be returned to the owner until the charges are paid, and that failure to request or to attend a scheduled hearing shall result in liability for this cost.

(2) The postseizure hearing shall be conducted within 48 hours of the request, excluding weekends and holidays. The seizing agency may authorize its own officer or employee to conduct the hearing if the hearing officer is not the same person who directed the seizure or impoundment of the animal and is not junior in rank to that person. The agency may use the services of a hearing officer from outside the agency for the purposes of complying with this section.

(3) Failure of the owner or keeper, or of their agent, to request or to attend a scheduled hearing shall result in a forfeiture of any right to a postseizure hearing or right to challenge their liability for costs incurred.

(4) The agency, department, or society employing the person who directed the seizure shall be responsible for the costs incurred for caring and treating the animal, if it is determined in the postseizure hearing that the seizing officer did not have reasonable grounds to believe very prompt action, including seizure of the animal, was required to protect the health or safety of the animal or the health or safety of

others. If it is determined the seizure was justified, the owner or keeper shall be personally liable to the seizing agency for the full cost of the seizure and care of the animal. The charges for the seizure and care of the animal shall be a lien on the animal. The animal shall not be returned to its owner until the charges are paid and the owner demonstrates to the satisfaction of the seizing agency or the hearing officer that the owner can and will provide the necessary care for the animal.

(g) Where the need for immediate seizure is not present and before the commencement of any criminal proceedings authorized by this section, the agency shall provide the owner or keeper of the animal, if known or ascertainable after reasonable investigation, with the opportunity for a hearing before any seizure or impoundment of the animal. The owner shall produce the animal at the time of the hearing unless, before the hearing, the owner has made arrangements with the agency to view the animal upon request of the agency, or unless the owner can provide verification that the animal was humanely euthanized. Any person who willfully fails to produce the animal or provide the verification is guilty of an infraction, punishable by a fine of not less than two hundred fifty dollars (\$250) nor more than one thousand dollars (\$1,000).

(1) The agency shall cause a notice to be affixed to a conspicuous place where the animal was situated or personally deliver a notice stating the grounds for believing the animal should be seized under subdivision (a) or (b). The notice shall include all of the following:

(A) The name, business address, and telephone number of the officer providing the notice.

(B) A description of the animal to be seized, including any identification upon the animal.

(C) The authority and purpose for the possible seizure or impoundment.

(D) A statement that, in order to receive a hearing before any seizure, the owner or person authorized to keep the animal, or their agent, shall request the hearing by signing and returning the enclosed declaration of ownership or right to keep the animal to the officer providing the notice within two days, excluding weekends and holidays, of the date of the notice.

(E) A statement that the cost of caring for and treating any animal properly seized under this section is a lien on the animal, that any animal seized shall not be returned to the owner until the charges are paid, and that failure to request or to attend a scheduled hearing shall result in a conclusive determination that the animal may properly be seized and that the owner shall be liable for the charges.

(2) The preseizure hearing shall be conducted within 48 hours, excluding weekends and holidays, after receipt of the request. The seizing agency may authorize its own officer or employee to conduct the hearing if the hearing officer is not the same person who requests the seizure or impoundment of the animal and is not junior in rank to that person. The agency may use the services of a hearing officer from outside the agency for the purposes of complying with this section.

(3) Failure of the owner or keeper, or their agent, to request or to attend a scheduled hearing shall result in a forfeiture of any right to a preseizure hearing or right to challenge their liability for costs incurred pursuant to this section.

(4) The hearing officer, after the hearing, may affirm or deny the owner's or keeper's right to custody of the animal and, if reasonable grounds are established, may order the seizure or impoundment of the animal for care and treatment.

(h) If any animal is properly seized under this section or pursuant to a search warrant, the owner or keeper shall be personally liable to the seizing agency for the cost of the seizure and care of the animal. Further, if the charges for the seizure or impoundment and any other charges permitted under this section are not paid within 14 days of the seizure, or if the owner, within 14 days of notice of availability of the animal to be returned, fails to pay charges permitted under this section and take possession of the animal, the animal shall be deemed to have been abandoned and may be humanely euthanized or otherwise properly disposed of by the seizing agency.

(i) If the animal requires veterinary care and the humane society or public agency is not assured, within 14 days of the seizure of the animal, that the owner will provide the necessary care, the animal shall not be returned to its owner and shall be deemed to have been abandoned and may be humanely euthanized or otherwise properly disposed of by the seizing agency. A veterinarian may humanely euthanize an impounded animal without regard to the prescribed holding period when it has been determined that the animal has incurred severe injuries or is incurably crippled. A veterinarian also may immediately humanely euthanize an impounded animal afflicted with a serious contagious disease unless the owner or the owner's agent immediately authorizes treatment of the animal by a veterinarian at the expense of the owner or agent.

(j) No animal properly seized under this section or pursuant to a search warrant shall be returned to its owner until the owner can demonstrate to the satisfaction of the seizing agency or hearing officer that the owner can and will provide the necessary care for the animal.

(k) (1) In the case of cats and dogs, before the final disposition of any criminal charges, the seizing agency or prosecuting attorney may file a petition in a criminal action requesting that, before that final disposition, the court issue an order forfeiting the animal to the city, county, or seizing agency. The petitioner shall serve a true copy of the petition upon the defendant and the prosecuting attorney.

(2) Upon receipt of the petition, the court shall set a hearing on the petition. The hearing shall be conducted within 14 days after the filing of the petition, or as soon as practicable.

(3) The petitioner shall have the burden of establishing beyond a reasonable doubt that, even in the event of an acquittal of the criminal charges, the owner will not legally be permitted to retain the animal in question. If the court finds that the petitioner has met its burden, the court shall order the immediate forfeiture of the animal as sought by the petition.

(4) Nothing in this subdivision is intended to authorize a seizing agency or prosecuting attorney to file a petition to determine an owner's ability to legally retain

an animal pursuant to paragraph (3) of subdivision (f) if a petition has previously been filed pursuant to this subdivision.

(f) (1) Upon the conviction of a person charged with a violation of this section, or Section 597 or 597a, all animals lawfully seized and impounded with respect to the violation shall be adjudged by the court to be forfeited and shall thereupon be transferred to the impounding officer or appropriate public entity for proper adoption or other disposition. A person convicted of a violation of this section shall be personally liable to the seizing agency for all costs of impoundment from the time of seizure to the time of proper disposition. Upon conviction, the court shall order the convicted person to make payment to the appropriate public entity for the costs incurred in the housing, care, feeding, and treatment of the seized or impounded animals. Each person convicted in connection with a particular animal may be held jointly and severally liable for restitution for that particular animal. The payment shall be in addition to any other fine or sentence ordered by the court.

(2) The court may also order, as a condition of probation, that the convicted person be prohibited from owning, possessing, caring for, or residing with, animals of any kind, and require the convicted person to immediately deliver all animals in the convicted person's possession to a designated public entity for adoption or other lawful disposition or provide proof to the court that the person no longer has possession, care, or control of any animals. In the event of the acquittal or final discharge without conviction of the person charged, if the animal is still impounded, the animal has not been previously deemed abandoned pursuant to subdivision (h), the court has not ordered that the animal be forfeited pursuant to subdivision (k), the court shall, on demand, direct the release of seized or impounded animals to the defendant upon a showing of proof of ownership.

(3) Any questions regarding ownership shall be determined in a separate hearing by the court where the criminal case was finally adjudicated and the court shall hear testimony from any persons who may assist the court in determining ownership of the animal. If the owner is determined to be unknown or the owner is prohibited or unable to retain possession of the animals for any reason, the court shall order the animals to be released to the appropriate public entity for adoption or other lawful disposition. This section is not intended to cause the release of any animal, bird, reptile, amphibian, or fish seized or impounded pursuant to any other statute, ordinance, or municipal regulation. This section shall not prohibit the seizure or impoundment of animals as evidence as provided for under any other provision of law.

(m) It shall be the duty of all peace officers, humane society officers, and animal control officers to use all currently acceptable methods of identification, both electronic and otherwise, to determine the lawful owner or caretaker of any seized or impounded animal. It shall also be their duty to make reasonable efforts to notify the owner or caretaker of the whereabouts of the animal and any procedures available for the lawful recovery of the animal and, upon the owner's and caretaker's initiation of recovery procedures, retain custody of the animal for a reasonable period of time to allow for completion of the recovery process. Efforts to locate or contact the owner or caretaker

and communications with persons claiming to be the owner or caretaker shall be recorded and maintained and be made available for public inspection.

(Amended by Stats. 2019, Ch. 7, Sec. 19. (AB 1553) Effective January 1, 2020.)

State of California

BUSINESS AND PROFESSIONS CODE

Section 4827

4827. (a) Nothing in this chapter prohibits any person from:

(1) Practicing veterinary medicine as a bona fide owner of one's own animals. This exemption applies to the following:

(A) The owner's bona fide employees.

(B) Any person assisting the owner, provided that the practice is performed gratuitously.

(2) Lay testing of poultry by the whole blood agglutination test. For purposes of this section, "poultry" means flocks of avian species maintained for food production, including, but not limited to, chickens, turkeys, and exotic fowl.

(3) Making any determination as to the status of pregnancy, sterility, or infertility upon livestock, equine, or food animals at the time an animal is being inseminated, providing no charge is made for this determination.

(4) Administering sodium pentobarbital for euthanasia of sick, injured, homeless, or surrendered domestic pets or animals without the presence of a veterinarian when the person is an employee of an animal control shelter and its agencies or humane society and has received proper training in the administration of sodium pentobarbital for these purposes.

(5) Providing the following care to animals lawfully deposited with or impounded by a shelter not registered with the board pursuant to Section 4853:

(A) Administering preventative or prophylactic nonprescription vaccinations to the animal pursuant to protocols written by a veterinarian licensed in this state for the purposes of preventing the spread of communicable diseases, without the presence of a veterinarian when the person has received proper training in the administration of the nonprescription preventative or prophylactic vaccinations.

(B) Administering nonprescription medications to the animal pursuant to protocols written by a veterinarian licensed in this state, for the control or eradication of apparent or anticipated internal or external parasites, including, but not limited to, fleas, ticks, or worms, without the presence of a veterinarian when the person has received proper training in the administration of the nonprescription medications for the control or eradication of those internal or external parasites. A person's decision to administer these medications shall not be construed to mean the person has made a diagnosis of the animal's medical condition.

(C) Administering medications prescribed by a veterinarian licensed in the state to the animal without the presence of a veterinarian when the shelter has received a written treatment plan from the licensed veterinarian for that specific animal and has a dispensing protocol in place for the tracking of dispensed prescribed medications

and when the person has received proper training in the administration of prescription medications.

(b) For the purposes of paragraph (5) of subdivision (a):

(1) "Proper training" means completing a training curriculum of at least four hours provided by a veterinarian licensed to practice in this state, and includes, but is not limited to, an overview of intake procedures and preventative medicine, recognizing when an animal is required to be seen by a veterinarian, prescription and nonprescription medications, humane animal restraint techniques, vaccination injection methods and procedures, and documentation.

(2) "Shelter" means a public animal control agency or shelter, society for the prevention of cruelty to animals shelter, or humane society shelter that is not registered with the board pursuant to Section 4853.

(c) A shelter providing care to an animal pursuant to this section that is not registered with the board pursuant to Section 4853 shall report to the board any adverse event resulting in significant impairment or death from the care provided, on a form prescribed by the board, including severe injuries, infections, and unintended reactions caused by the incorrect or inappropriate administration of a vaccine or medications.

(Amended by Stats. 2021, Ch. 631, Sec. 4. (AB 1535) Effective January 1, 2022.)

<p align="center">SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</p>	<p align="center">Reserved for Clerk's File Stamp</p> <p align="center">FILED Superior Court of California County of Los Angeles 12/02/2022 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>C. Del Rio</u> Deputy</p>
<p>COURTHOUSE ADDRESS:</p> <p>Stanley Mosk Courthouse</p> <p>111 North Hill Street, Los Angeles, CA 90012</p>	
<p>PLAINTIFF(S):</p> <p>JULIA MILDENBERGER, in her individual capacity and in her capacity</p>	
<p>DEFENDANT(S):</p> <p>County of Los Angeles</p>	
<p align="center">NOTICE OF TRIAL SETTING CONFERENCE AND ATTACHED ORDERS THEREON</p>	<p>CASE NUMBER:</p> <p>22STCP04242</p>

You are hereby notified that the above matter has been set for trial setting conference on 03/09/2023
at 9:30 AM in Department 85
of the above-entitled court.

You are ordered to give notice of this hearing and serve a copy of this notice to all parties to the action within 10 days of service of this notice.

Sherri R. Carter, Executive Officer / Clerk of Court

Date: 12/02/2022

By, C. Del Rio
Deputy Clerk

NOTICE OF TRIAL SETTING CONFERENCE AND ATTACHED ORDERS THEREON

<p align="center">SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</p>	<p align="center">Reserved for Clerk's File Stamp</p>
<p>COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012</p>	<p align="center">FILED Superior Court of California County of Los Angeles 12/02/2022</p>
<p>PLAINTIFF/PETITIONER: JULIA MILDENBERGER, in her individual capacity and in her capacity as CEO of Southern California Cat Adoption Tails,; a California nonprofit corporation</p>	<p>Sherri R. Carter, Executive Officer / Clerk of Court By: <u>C. Del Rio</u> Deputy</p>
<p>DEFENDANT/RESPONDENT: County of Los Angeles</p>	
<p align="center">CERTIFICATE OF MAILING</p>	<p>CASE NUMBER: 22STCP04242</p>

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Trial Setting Conference and Attached Orders Thereon upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Los Angeles, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

MARLA A TAUSCHER
Law Office of Marla Tauscher
225 S. LAKE AVE., STE. 300
PASADENA, CA 91101

Sherri R. Carter, Executive Officer / Clerk of Court

Dated: 12/2/2022

By: C. Del Rio
Deputy Clerk

Exhibit F

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp <div style="text-align: center;"> FILED Superior Court of California County of Los Angeles 12/01/2022 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>R. Perez</u> Deputy </div>
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012		
NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE		
Your case is assigned for all purposes to the judicial officer indicated below.		CASE NUMBER: 22STCP04242

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

ASSIGNED JUDGE	DEPT	ROOM	ASSIGNED JUDGE	DEPT	ROOM
✓ James C. Chalfant	85				

Given to the Plaintiff/Cross-Complainant/Attorney of Record

Sherri R. Carter, Executive Officer / Clerk of Court

on 12/01/2022
(Date)

By R. Perez, Deputy Clerk

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within 15 days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.

Exhibit G

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012		FILED Superior Court of California County of Los Angeles 12/02/2022 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>C. Del Rio</u> Deputy
PLAINTIFF(S): JULIA MILDENBERGER, in her individual capacity and in her capacity		
DEFENDANT(S): County of Los Angeles		
NOTICE OF TRIAL SETTING CONFERENCE AND ATTACHED ORDERS THEREON		CASE NUMBER: 22STCP04242

You are hereby notified that the above matter has been set for trial setting conference on 03/09/2023
 at 9:30 AM in Department 85
 of the above-entitled court.

You are ordered to give notice of this hearing and serve a copy of this notice to all parties to the action within 10 days of service of this notice.

Sherri R. Carter, Executive Officer / Clerk of Court

Date: 12/02/2022

By, C. Del Rio
 Deputy Clerk

NOTICE OF TRIAL SETTING CONFERENCE AND ATTACHED ORDERS THEREON

Exhibit H

MARLA TAUSCHER, SBN 259630
 225 S. Lake Ave., Ste. 300
 Pasadena, California 91101
 Phone: (626) 345-5777
 Fax: (760) 444-2742
 e-mail: marla@attymat.com

Attorney for Petitioner/Plaintiff
 JULIA MILDENBERGER

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES
 STANLEY MOSK COURTHOUSE**

JULIA MILDENBERGER, in her individual
 capacity and in her capacity as CEO of
 SOUTHERN CALIFORNIA CAT
 ADOPTION TAILS; a California nonprofit
 corporation,

Petitioner/Plaintiff

vs.

COUNTY OF LOS ANGELES; and DOES 1
 through 50, inclusive,

Respondents/Defendants

Case No.: 22STCP04242

EX PARTE APPLICATION FOR
 TEMPORARY RESTRAINING ORDER
 AND OSC

[Declarations of Julia Mildenberger and Marla
 Tauscher filed concurrently]

Petition Filed: December 1, 2022
 Department: 85
 Judge: Hon. James Chalfant
 Hearing Date: December 8, 2022
 Hearing Time: 8:30 a.m.
 Trial Date: TBD

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE

1 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**
 2 **RECORD:**

3 **PLEASE TAKE NOTICE** that on Thursday, December 8, 2022, at 8:30 a.m., or as soon
 4 thereafter as this matter may be heard in Department 85 of the above-entitled court, located at
 5 111 N. Hill Street, Los Angeles, CA 90012, Petitioner/Plaintiff Julia Mildenerger (hereinafter
 6 "Petitioner/Plaintiff") will, and hereby does, apply to the Court *ex parte* pursuant to California
 7 Rule of Court 3.1300(b) for a Temporary Restraining Order ("TRO") and Order to Show Cause
 8 ("OSC") why a preliminary injunction should not issue. This Application is made to compel
 9 Respondent County of Los Angeles to immediately return to Petitioner/Plaintiff animals seized
 10 from her property by Respondent/Defendant County of Los Angeles Department of Animal
 11 Control (hereinafter "LADAC") on October 26, 2022

12 Petitioner files this *Ex Parte* Application for a Temporary Restraining Order to compel
 13 the return of Petitioner/Plaintiff's animals to her because LADAC has disregarded all applicable
 14 laws governing the seizure of animals in cases where animal neglect is alleged.

15 This motion is based upon this Application, the attached Memorandum of Points and
 16 Authorities, Declaration of Marla Tauscher, Declaration of Julia Mildenerger, Order to Show
 17 Cause, and the pleadings, files and records herein, and such additional argument as may be
 18 presented by Petitioner at or before the hearing on this *Ex Parte* Application.

19 Petitioner/Plaintiff hereby applies for, and submits that the interests of justice require
 20 that, a Temporary Restraining Order issue to compel LADAC to immediately return all of the
 21 seized animals to Petitioner/Plaintiff Julia Mildenerger.
 22
 23
 24
 25
 26
 27
 28

MEMORANDUM OF POINTS AND AUTHORITIES

I. STATEMENT OF THE CASE

Petitioner/Plaintiff runs a non-profit animal rescue called Southern California Cat Adoption Tails (hereinafter “SCCAT”) from her property in Littlerock, California. Petitioner/Plaintiff has saved the lives of thousands of cats, kittens, and dogs since the rescue’s inception in 2006. Petitioner/Plaintiff has held animal facility licenses (hereinafter “kennel permits”) for both cats and dogs issued by LADAC since 2011 when she moved to Littlerock, California.

Every year, Petitioner/Plaintiff has received a grade of “A” based on inspections by LADAC personnel. *See* Exhibit 2 to Writ Petition and Complaint. The inspection reports from previous years are missing and were likely taken by LADAC in the “box of Misc. documents” that they seized from Petitioner/Plaintiff’s property.

Since the beginning of the COVID-19 pandemic, in approximately March 2020, LADAC (and many other Southern California animal control agencies, including Los Angeles Animal Services – City animal control) have refused to take in cats or kittens despite the fact that taking in abandoned and stray animals is quite literally *their job*. Since early 2020, LADAC personnel have routinely been telling animal rescue organizations and individuals to just dump stray and abandoned animals where they found them, on the streets, in fields, or somewhere else.

As a result of LADAC’s unofficial policy of refusing to take in animals, Petitioner/Plaintiff has had litters of kittens and puppies dumped just outside the gate of her facility for over two years. In just the six weeks leading up to the raid on her property alone, 5 or 6 litters of kittens (about 30 kittens in total) were dumped outside Petitioner/Plaintiff’s property. Similarly, a litter of 8 puppies was abandoned just outside Petitioner/Plaintiff’s gate a week before the raid on October 26, 2022.

In mid-August 2022, Petitioner/Plaintiff submitted the required paperwork and payment for the renewal of her kennel permit which was set to expire on September 2, 2022 and has been waiting for LADAC to conduct its annual inspection. To that end, on October 18, 2022,

1 Petitioner/Plaintiff's counsel contacted LADAC personnel in charge of licensing, Lisa Eldridge
2 (hereinafter "Eldridge") to inquire about the status of the inspection. Eldridge responded to
3 counsel that day by falsely stating, "...our business license inspectors are backlogged and *we*
4 *don't anticipate being out for several weeks.*" At the time she responded, Eldridge had no
5 intention of conducting an inspection and was already well into the planning of her raid on
6 Petitioner/Plaintiff's property a week later.

7 Instead of conducting an inspection, Eldridge showed up at Petitioner/Plaintiff's property
8 early on the morning of October 26, 2022 with approximately 12 LADAC personnel and an
9 additional 12 Los Angeles County Sheriff Department deputies (hereinafter "LASD").
10 Petitioner/Plaintiff had taken several cats to the LADAC Palmdale facility early on the morning
11 of October 26, 2022 to have them spayed and neutered.

12 When she arrived home, after entering the property, Petitioner/Plaintiff went to close the
13 gates to the property and was accosted by a dozen LASD personnel in full riot gear with guns
14 drawn – for a raid on a cat rescue!

15 LASD deputies ordered Petitioner/Plaintiff to exit the property, held her hands behind her
16 back, and locked her in the back seat of a Sheriff car for more than an hour and a half, while
17 refusing to tell Petitioner/Plaintiff why they were there. Only when Petitioner/Plaintiff was
18 released from the sheriff car, was she told that the reason they were there was to seize all of the
19 animals on the property.

20 Petitioner/Plaintiff was not informed of the existence of a search warrant until LADAC
21 and LASD personnel were leaving her property, at approximately 4:00 p.m., when someone
22 handed Petitioner/Plaintiff a copy of the search warrant – without the statement/affidavit of
23 probable cause – as they were exiting her property.

24 LADAC was not entitled to seek or serve a search warrant under the circumstances.
25 California law, specifically *California Penal Code (hereinafter "PC") §597.1* governs the
26 seizure and impoundment of animals where animal neglect is alleged. *PC §597.1* is a complex
27
28

1 statute, with 13 subsections, many of which are intended to safeguard animal owners'
2 Constitutional right to due process.

3 II. ARGUMENT

4 A. LADAC Was Not Entitled to Obtain a Search Warrant Under the 5 Circumstances

6 Where a person's property is taken by the government, the due process clause of the
7 Fourteenth Amendment requires some form of notice and a hearing. *Beaudreau v. Superior*
8 *Court* (1975) 14 Cal.3d 448, 458; *Mathews v. Eldridge* (1976) 424 U.S. 319. "Absent
9 extraordinary circumstances justifying resort to summary procedures, the hearing must take
10 place *before* the property is taken." As explained in *Fuentes v. Shevin* (1972) 407 U.S. 67, 81-
11 82. "If the right to notice and a hearing is to serve its full purpose, then, it is clear that it must
12 be granted at a time when the deprivation can still be prevented." In other words, before the
13 deprivation of property. If LADAC claims that it seized the animals pursuant to some other
14 statute or provision, it is still not relieved of the requirement to convene a hearing *promptly after*
15 *the seizure*.

16 Indeed, *California Penal Code §597.1*, *the only statute that provides for the seizure of*
17 *the animals in this case*, sets forth specific procedures for hearings related to the seizure of
18 animals in cases of suspected neglect. *PC §597.1* contains pre- and post-seizure hearing
19 provisions in subsections (f) and (g) that were added to *PC §597.1* in 1990 by AB35, which
20 recognized the need for *due process* with respect to the seizure of animals.

21 *PC §597.1* subsection (g) *requires a pre-seizure hearing* where there is no need for an
22 immediate seizure of animals. LADAC made no attempt whatsoever to comply with the pre-
23 seizure hearing requirements of *PC §597.1*, because they were intent on seizing animals
24 regardless of the facts.

25 *PC §597.1(f)* permits the seizure of animals prior to a hearing only where there is a
26 "reasonable belief that prompt action is required to protect the health or safety of the animal or
27 the health or safety of others." There are no facts cited in the search warrant that could have led
28

1 to a reasonable belief that an immediate seizure of the animals was necessary or justified.
 2 Interestingly, there are no facts alleged in the subsequent press release issued by LADAC that
 3 would constitute exigent circumstances.

4 *PC §597.1(f)* sets forth the requirements and procedures for a “*post-seizure hearing to*
 5 *determine the validity of the seizure or the impoundment or both*”, all of which have been
 6 ignored by LADAC. The seizing agency is required to post or personally serve the owner or
 7 custodian of the animals with notice that he/she is entitled to a hearing to challenge the validity
 8 of the seizure or impoundment.

9 That notice is required to be personally served or posted at the property from which the
 10 animals were seized within 48 hours of the seizure, excluding weekends and holidays. *PC*
 11 *§597.1(f)(1)*. In this case, LADAC was required to post notice of the seizure and
 12 Petitioner/Plaintiff’s right to a post-seizure hearing by end of day Friday, October 28, 2022. As
 13 of this writing, 42 days after the seizure of the animals, LADAC has failed to post notice of a
 14 post-seizure hearing, in violation of State law and Petitioner/Plaintiff’s Constitutional right to
 15 due process.

16 LADAC has also failed to provide any information about the disposition of the animals
 17 and LADAC’s fees for holding the animals, among other things, despite written requests from
 18 Petitioner/Plaintiff’s counsel. In the absence of exigent circumstances, LADAC was required
 19 by *PC 597.1(g)* to conduct a hearing *prior to the seizure of the animals*, to safeguard
 20 Petitioner/Plaintiff’s right to due process. *Broden v. Marin Humane Society* (1999) 70 Cal. App.
 21 4th 1212, 1220-1221. In seizing Petitioner/Plaintiff’s animals, LADAC has ignored all of the
 22 statutory requirements that govern such endeavors, namely several provisions of *California*
 23 *Penal Code (hereinafter “PC”) §597.1*, which governs the seizure of animals in cases of
 24 suspected neglect/abuse.

25 Petitioner/Plaintiff was not arrested and no charges have been filed against her, so she has
 26 no legal recourse at this point, other than filing a lawsuit and this application for a temporary
 27 restraining order to redress her ongoing injury; the deprivation of her animals.
 28

**B. LADAC Must be Estopped from Refusing to Return the Animals to
Petitioner/Plaintiff Based on Kennel Permits LADAC Allowed to Lapse**

As part of the annual renewal of kennel permits, LADAC performs inspections of the permitholders' facilities. Petitioner/Plaintiff has held kennel permits for cats and dogs since 2011. Those permits expire on September 2 every year, but LADAC has not performed its annual inspection prior to the expiration date of the permits ever. In fact, in past years, LADAC has performed its annual inspection of Petitioner/Plaintiff's facility as late in the year as late December.

Petitioner/Plaintiff paid the requisite permit renewal fee on August 15, 2022 and her check was cashed by the County on August 23, 2022. Attached hereto as Exhibit 1 is a true and correct copy of the check from Petitioner/Plaintiff to LADAC. When LADAC had not contacted Petitioner/Plaintiff for an inspection by mid-October 2022, Petitioner/Plaintiff contacted LADAC to inquire about the inspection and was told by Eldridge that "...our business license inspectors are backlogged and *we don't anticipate being out for several weeks.*" Attached hereto as Exhibit 2 is a true and correct copy of the email exchange with Eldridge. Petitioner/Plaintiff had no reason to disbelieve that statement at the time, based on past precedent.

"Equity does not wait upon precedent which exactly squares with the facts in controversy, but will assert itself in those situations where right and justice would be defeated but for its intervention." *Times Mirror Company v. Superior Court of Los Angeles County* (1935) 3 Cal. 2d. 309, 331. The doctrine of equitable estoppel has roots in conscience and fair dealing. Equitable estoppel requires four factors: (1) the party to be estopped must be apprised of the facts; (2) he must intend that his conduct shall be acted upon, or must so act that the party asserting the estoppel had a right to believe it was so intended; (3) the other party must be ignorant of the true state of facts; and (4) he must rely upon the conduct to his injury. *Kieffer v. Spencer* (1984) 153 Cal. App. 3d 954, 963.

1 In this case, LADAC personnel were 100% in control of the timing and facts of the
 2 inspection of Petitioner/Plaintiff's facility and had all of the information needed to conduct the
 3 inspection. When Eldridge told Petitioner/Plaintiff on October 18, 2022 that LADAC inspectors
 4 were backlogged and would conduct the inspection in "several weeks", Eldridge knew she was
 5 lying, but Petitioner/Plaintiff had no way of knowing that at the time. Because the annual
 6 inspections were not conducted on time in previous years, Petitioner/Plaintiff had no reason to
 7 believe that the inspection would be any different from previous years and she relied on
 8 Eldridge's statement that the inspection would take place in several weeks. Petitioner/Plaintiff
 9 took no further action to compel an inspection and issuance of the renewed permit because she
 10 believed Eldridge.

11 LADAC must be estopped from intentionally allowing a kennel permit to expire through
 12 its own conduct – failing to conduct timely facility inspections – to subsequently claim that a
 13 permit is expired and refuse to return animals, or to take any other punitive action, based on its
 14 own conduct.

15 **C. A TRO Should Be Granted Because LADAC Has No Legal Basis for**
 16 **Continuing to Detain Petitioner/Plaintiff's Animals**

17 *The language of PC §597.1 is unambiguous and unconditional* and expressly provides
 18 for pre-seizure and post-seizure hearings in connection with the seizure of animals. The express
 19 language of *PC §597.1(a)(1)* makes very clear that the seizure and impoundment of animals in
 20 cases of suspected neglect was intended only to apply to "stray and abandoned animals".

21 Furthermore, several subsections of *PC §597.1* make clear that the seizure and
 22 impoundment of animals in such cases was not intended to permanently deprive the animal's
 23 owner of possession and ownership of the animals and make direct reference to returning the
 24 animals to their owner. *PC §597.1(f)(4), (h), (i), and (j)*.

25 LADAC disregarded *PC §597.1* in its entirety when it seized Petitioner/Plaintiff's
 26 animals alleging animal neglect. As such, LADAC had no basis for the seizure of the animals
 27 and, likewise, has no legal basis for the continued impoundment of Petitioner/Plaintiff's animals,
 28

1 especially where LADAC will demand payment for daily “boarding” and other fees at rates they
 2 refuse to disclose and that will likely have no relationship to the actual cost of care of the animals
 3 they unlawfully seized.

4 **D. An Injunction Should Issue Where (1) the Applicant is Likely to Prevail on the**
 5 **Merits; and (2) the Applicant Will Suffer Irreparable Harm if Injunctive Relief is Denied**

6 A superior court must evaluate two interrelated factors when determining whether
 7 injunctive relief is appropriate: (1) the likelihood that the plaintiff will prevail on the merits at
 8 trial and (2) the harm that a plaintiff will likely sustain if an injunction is denied balanced against
 9 the possible harm the defendant would be likely to suffer if the preliminary injunction were
 10 issued. *Cohen v. Board of Supervisors* (2010) 40 Cal. 3d 277, 286. Weighing these factors lies
 11 within the broad discretion of the superior court. *Butt v. State of California* (1992) 4 Cal. 4th
 12 668, 678.

13 **1. Petitioner is Likely to Prevail on the Merits at Trial Where the Law Clearly**
 14 **Requires LADAC to Comply with the Law Governing the Seizure of Animals in**
 15 **Cases Where Animal Neglect is Alleged**

16 As discussed above, and in more detail in the Petition for Writ of Mandate and Complaint
 17 for Damages pursuant to 42 U.S.S. §1983, the continued impoundment of Petitioner/Plaintiff’s
 18 animals where LADAC has ignored all of the hearing requirements of PC §597.1 is unlawful
 19 and must be invalidated. The return of her animals to Petitioner/Plaintiff under the circumstances
 20 is a matter of black letter law, not subject to discretion.

21 **2. Petitioner Will Suffer Irreparable Harm if LADAC Does Not Return Her**
 22 **Animals Immediately as Required by Law**

23 Animals are unlike other types of property, in that they each have distinct characteristics.
 24 They cannot be replaced like a car or a sofa because each is unique and cherished for its
 25 individual qualities. Petitioner/Plaintiff has devoted decades of her life to rescuing discarded
 26 animals and has spent thousands of dollars to incorporate her rescue organization, and to
 27 construct buildings and other structures for housing the animals. She has spent countless hours
 28

1 providing quality care for the animals at her facility. So much so, that LADAC has rated her
2 facility "A" for years, even as recently as February 2022.

3 The disposition of the seized animals is unknown because LADAC refuses to disclose
4 the information. LADAC has likely already killed some of the seized animals and will likely
5 begin transferring the animals to third parties, if it has not done so already. Killing the animals
6 and/or transferring them to others would permanently deprive Petitioner/Plaintiff of her animals,
7 without affording her even a pretense of due process; no notice, no opportunity to be heard prior
8 to, or after the seizure.

9 "If denial of an injunction would result in great harm to the plaintiff, and the defendants
10 would suffer little harm if it were granted, then it is an *abuse of discretion* to *fail to grant* the
11 preliminary injunction." *Robbins v. Sup.Ct. (County of Sacramento)* (1985) 38 Cal. 3d 199, 205.
12 The County would not suffer any harm if injunctive relief is granted, because (1) LADAC would
13 have approximately 200 fewer animals to house and feed, freeing up space for other animals who
14 have the misfortune of ending up at an animal control facility; (2) LADAC would have to kill
15 fewer animals for lack of space; (3) LADAC would actually save money and resources by having
16 200 fewer animals to house and feed.

17 By contrast, if LADAC is not compelled to return her animals, Petitioner/Plaintiff will
18 be devastated. Her rescue organization will cease to exist and she will have spent untold dollars
19 with no future in rescue. There is nothing that can compensate her for the loss of her life's
20 passion if Petitioner/Plaintiff's animals are permanently taken from her.

21 It is clear that LADAC has no intention of providing a post-seizure hearing to determine
22 whether its seizure of the animals was valid, depriving Petitioner/Plaintiff of her only avenue to
23 due process at this point. In any event, it is too late to convene a post-seizure hearing. LADAC
24 has forfeited its only opportunity to deem its seizure valid, and has no legal grounds for continued
25 impoundment of the animals or to charge fees for said impoundment and seizure.

26 There is no remedy other than an injunction to prevent LADAC from unlawfully
27 continuing to withhold Petitioner/Plaintiff's animals that would redress the injury to
28

1 Petitioner/Plaintiff. “The court must exercise its discretion ‘in favor of the party most likely to
2 be injured’.” *Robbins, supra*, at 205.

3 A TRO may issue when it appears from the facts shown by a verified complaint that great
4 or irreparable injury will result to the applicant before the matter can be heard on notice. *Cal.*
5 *Code of Civ. Proc.* §527(c)(1). An injunction may also issue when it appears the commission or
6 continuance of some act during the litigation would produce waste, or great or irreparable injury,
7 to a party to the action. *Cal. Code of Civ. Proc.* §526(a)(2).

8 The injury to Petitioner/Plaintiff began when LADAC seized and impounded her animals
9 on October 26, 2022 and continues unabated as LADAC has failed to provide even minimal due
10 process in the form of a hearing. The deprivation of her animals for so long has been hard enough
11 for Petitioner/Plaintiff, but continued impoundment and permanent deprivation would be
12 unbearable for Petitioner/Plaintiff and her rescue organization.

13 Nothing can bring back the time lost with her animals, but a temporary restraining order
14 compelling the return of the animals would go a long way toward righting this wrong. An
15 injunction compelling the return of Petitioner/Plaintiff’s animals would further serve the public
16 interest by discouraging LADAC from seizing and impounding people’s animals in
17 contravention of applicable law.

18 **E. A Temporary Restraining Order May Issue to Prevent Violation of the Rights of a**
19 **Party in Litigation**

20 An injunction may be granted where it appears, during the litigation, that a party to the
21 action is doing, or threatens, or is about to do, or is procuring or suffering to be done, some act
22 in violation of the rights of another party to the action respecting the subject of the action and
23 tending to render the judgment ineffectual. *Cal. Code of Civ. Proc.* §526(a)(3). The County and
24 LADAC have already violated Petitioner/Plaintiff’s rights by unlawfully continuing to withhold
25 her animals from her and giving no indication that they intend to return them. In fact, LADAC
26 has not provided any information about the animals at all.

At LADAC's facilities, Petitioner/Plaintiff's animals are being neglected, in violation of California animal cruelty statutes. California law, specifically, Penal Code §597t requires *every person* who keeps any animal in confinement, to provide an adequate exercise area for the animal. LADAC does not provide any exercise for what it calls "evidence" animals. They are confined in small cells, in isolation, 24 hours a day without any human or animal interaction or stimulation. The animals are deprived of any comfort and forced to live in concrete or metal enclosures in solitary confinement without any bedding, blankets or other creature comforts. The conditions in which they are maintained by LADAC would constitute animal cruelty in any other context and are detrimental to the animals' physical and mental well-being.

For the above reasons, a Temporary Restraining Order should be immediately issued to prevent further harm to Petitioner/Plaintiff and her animals and to compel the County to return the animals to Petitioner/Plaintiff immediately.

WHEREFORE Petitioner/Plaintiff prays for judgment against Respondents/Defendants as follows:

1. For an order requiring defendant to show cause, if any, why it should not be enjoined as set forth in this complaint during the pendency of this action;
2. For an order to LADAC to immediately return Petitioner/Plaintiff's animals to her unconditionally, without fees for impound/storage of the animals;
3. Issuance of an order prohibiting LADAC (or its agents) from making any disposition of the seized animals adverse to the interests of Petitioner/Plaintiff pending the resolution of this matter in its entirety; and
4. Issuance of an order prohibiting LADAC from demanding any payment as a condition or prerequisite for retaining ownership of the seized animals pending the resolution of this matter in its entirety.

Dated: December 6, 2022

Respectfully Submitted,

By: \s\ Marla Tauscher
Attorney for Petitioner/Plaintiff
Julia Mildenberger

EXHIBIT 1

IMAGE DETAILS

Front Back

THE FACE OF THIS DOCUMENT HAS A COLORFUL BACKGROUND ON WHITE PAPER AND ORIGINAL DOCUMENT SECURITY SCHEMES ON BACK WITH Hologram SECURITY FOOT.

S.C. CAT ADOPTION TAILS, INC.
P.O. BOX 922754
SYLMAR, CA 91392
PH. 818-943-1601

90-7182/3222 **R22-017430** 1629

DATE **8/15/22**

PAY TO THE ORDER OF **LA County Animal Care + Control** \$ **350⁰⁰**

Three Hundred & Fifty

CHASE BANK
SYLMAR FINANCIAL CENTER 3322
13750 FOOTHILL BLVD.
SYLMAR, CA 91342

MEMO **B21-2167 CS**
B21-2167 DK

#0016291#

AMSL

AUTHORIZED SIGNATURE

DOLLARS
Security Features
Look for marks on back.

IMAGE DETAILS

Back

Front

ENDORSE HERE

PAY TO THE ORDER OF
BANK OF AMERICA
122000661
FOR DEPOSIT ONLY
ANIMAL CARE AND CONTROL
ADMINISTRATION 01
1459480306

Seq: 191
Batch: 065995
Date: 08/23/22

Seq: 00191 08/23/22
BAI: 065995 CC: 3180000615
WT: 01 LIPS: Dallas PT
BC: Carmenita-Telegraph BC CA2-145



Padlock design is a certification mark of the Check
Payment Systems Association

Warning

Absence of the following Security Features may indicate alteration

1. Microprint	2. Color	3. Watermark	4. Security Thread
5. Hologram	6. Magnetic Ink	7. Ultraviolet	8. Other

*FEDERAL RESERVE BOARD OF GOVERNORS REG CC

EXHIBIT 2

Marla Tauscher

From: Lisa Eldridge <LEldridge@animalcare.lacounty.gov>
Sent: Tuesday, October 18, 2022 12:55 PM
To: Marla Tauscher
Cc: Harold Holmes
Subject: Re: SCCA Permit

Hello Marla,

I apologize for the delay, our business license inspectors are backlogged and we don't anticipate being out for several weeks. I apologize for the inconvenience.

Lisa Eldridge
County of Los Angeles
DACC - Public Safety Division Manager
31044 Charlie Canyon Road
Castaic, Ca 91384
661-257-3191
Sent from [Outlook Mobile](#)

From: Harold Holmes <HHolmes@animalcare.lacounty.gov>
Sent: Tuesday, October 18, 2022 12:49 PM
To: Marla Tauscher <marla@attymat.com>
Cc: Lisa Eldridge <LEldridge@animalcare.lacounty.gov>
Subject: RE: SCCA Permit

Good afternoon Ms. Tauscher,

I am copying Lisa Eldridge on this response because she will better be able to answer your question and make arrangements to move things along. Thank you for your understanding.

Sincerely,

Harold W. Holmes
He, him, his
Executive Assistant
County of Los Angeles
Department of Animal Care and Control
5898 Cherry Avenue
Long Beach, CA 90805
Tel (562)256-1362/Fax(562)422-3408
hholmes@animalcare.lacounty.gov





Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient(s), or designated agent, please contact the sender by reply e-mail and destroy all copies of the original e-mail.

From: Marla Tauscher <marla@attymat.com>
Sent: Tuesday, October 18, 2022 11:44 AM
To: Harold Holmes <HHolmes@animalcare.lacounty.gov>
Subject: SCCA Permit

CAUTION: External Email. Proceed Responsibly.

Hi Harold,

My client, Julia Mildenerger, had a hearing with you and Lisa Eldridge and me on April 26, 2022. We agreed that LADACC would conduct their inspections on Wednesdays or Fridays so that Ms. Mildenerger could make sure she is there when officers arrive. She has paid the annual renewal fee for her kennel permit as of September 2, 2022, but there has been no permit issued, because no one has come to conduct an inspection or contacted her about it.

She is available on Wednesdays and Fridays and would like to have the inspection done so she doesn't have to wait around on those days indefinitely. Is there a way to get the inspection done and the permit reissued?

Thanks,

Marla

*Marla Tauscher
Attorney at Law
225 S. Lake Ave., Ste. 300
Pasadena, CA 91101*

*Phone: (626) 345-5777
Cell: (760) 534-3143
e-Fax: (760) 444-2742
www.attymat.com*

This message and any files transmitted with it are confidential and may contain attorney-client privileged information. These materials are for the sole use of the intended recipient. If you are not the intended recipient, any use, distribution, or disclosure of this transmission or any information contained therein is prohibited. If you have received this message in error, please notify the sender immediately.

DECLARATION OF JULIA MILDENBERGER

I, Julia Mildenberger, declare under oath:

1. I am the founder of Southern California Cat Adoption Tails (hereinafter "SCCAT"), a non-profit animal rescue organization that I started in 2006.

2. I am the Petitioner/Plaintiff in the present case, No. STCP04242, and the custodian of the animals that are the subject of this litigation in my individual capacity and owner of the animals as CEO of the rescue organization.

3. I have first-hand, personal knowledge of the facts set forth in this declaration, and if called and sworn as a witness, I would testify competently to them.

4. SCCAT has saved the lives of thousands of animals in the sixteen years it has been in operation.

5. SCCAT and myself have held animal facility permits, aka "kennel permits" issued for cats and dogs by the Los Angeles County Department of Animal Control (hereinafter "LADAC") since I moved SCCAT to my current location in Littlerock, California, in 2011. Attached hereto as Exhibit 1 is a true and correct copy of the kennel permits for September 2021-2022.

6. The kennel permits are renewed annually, subject to inspection by LADAC personnel.

7. Every year since the permits were issued in 2011, LADAC has given SCCAT facilities a grade of "A" following inspections *by their own personnel*. See Exhibit 2 to Petition and Complaint.

8. In mid-August 2022 I paid LADAC the annual fees for the kennel permits and LADAC cashed my check on August 23, 2022. See Exhibit 1 to *Ex Parte* Application for a Temporary Restraining Order.

9. Every year, LADAC personnel conduct a physical inspection of the animal facilities on my property as a condition of renewal of the kennel permits they issue in both my name and the name of the rescue, SCCAT.

1 10. The kennel permits are valid through September 2 every year, but LADAC has
2 never conducted an inspection *prior to the permits' expiration date*, citing personnel shortages.

3 11. In fact, LADAC personnel have conducted annual renewal inspections as late as
4 December in some years.

5 12. Because there had been no attempt by LADAC to contact me or to perform their
6 annual inspection by mid-October 2022, I asked my attorney, Marla Tauscher, to inquire about
7 the inspection so that the renewed kennel permits could be issued.

8 13. On October 18, 2022, Ms. Tauscher, forwarded to me a copy of an email she sent
9 that day to Harold Holmes, Executive Assistant for LADAC to try to facilitate the annual
10 inspection. Mr. Holmes forwarded counsel's email to Lisa Eldridge, LADAC Public Safety
11 Division Manager, who falsely stated that the LADAC inspectors were backlogged and that
12 they would not be able to conduct an inspection of my facility for several weeks. *See Exhibit*
13 *2 to Ex Parte Application for a Temporary Restraining Order and Exhibit 3 to Petition for Writ*
14 *of Mandate and Complaint for Damages pursuant to 42 U.S.C. §1983.*

15 14. Early on the morning of October 26, 2022, I went to the LADAC Palmdale facility
16 to drop off some feral cats to be spayed and neutered, as part of a system of caring for feral
17 cats called Trap-Neuter-Return, or TNR. Feral cats can be very resistant to domestication, and
18 are best handled by sterilization and return to the location they were found.

19 15. I arrived back at my property at 7:50 a.m.

20 16. After I pulled into my driveway, as I was closing the gates, I was accosted by 10-
21 12 Los Angeles County Sheriff deputies in full riot gear, many of whom had their guns
22 unholstered and in their hands.

23 17. The sheriff deputies ordered me to step off my property and locked me in the back
24 seat off a patrol car for an hour and a half.

25 18. Sheriff deputies refused to tell me why they were at my property and what was
26 happening, despite my asking several times.

27 19. After a few hours, a deputy told me the sheriff deputies were there at the request
28 of LADAC who was seizing all the animals on the property.

20. I was not made aware that there was a search warrant until nearly 4:00 p.m., when someone from LADAC handed me a copy of the search warrant, as they were leaving my property.

21. Since the seizure of the animals from my property, I have had no further contact with LADAC. There has been no attempt by LADAC to personally serve me, or post notice of my right to a post-seizure hearing pursuant to *California Penal Code §597.1*.

22. I have devoted decades of my life to rescuing animals.

23. I have spent thousands of dollars and countless hours caring for unwanted and abandoned animals.

24. I have spent hundreds of thousands of dollars on improvements to my real property, building kennels and other structures to house animals.

25. I formed a California nonprofit corporation and obtained tax exempt status pursuant to section 501(c)(3) of the Internal Revenue Code for the sole purpose of operating an animal rescue organization.

26. I obtained the necessary permits/licenses from LADAC to operate an animal facility at my property in Littlerock, CA.

27. I will suffer irreparable harm if my animals are not returned to me, particularly if they are killed or transferred to third parties.

28. Without the animals, my rescue organization will cease to exist, as will my life's mission to provide housing, care, and comfort for defenseless animals.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 6th of December, 2022 at Littlerock, California.

Julia Mildnerberger

EXHIBIT 1

This license must be clearly visible to the general public and to patrons entering the facility
as defined in Los Angeles County Code Title 10 Section 10.28.280

COUNTY LICENSENo. B21-2167DK

COUNTY OF LOS ANGELES — STATE OF CALIFORNIA

THE LICENSEE NAMED HEREON HAS PAID TO THE UNDERSIGNED TAX COLLECTOR THE AMOUNT SHOWN AND IS HEREBY LICENSED, UNDER PROVISIONS OF TITLE 10, FOR THE PERIOD EXPIRING ON THE DATE SHOWN TO CARRY ON BUSINESS OR OCCUPATION OR MAINTAIN THE ANIMAL SPECIFIED, AT THE LOCATION SHOWN. THIS LICENSE IS SUBJECT TO ANY SPECIAL CONDITIONS SHOWN AND IS VALID ONLY IN THE UNINCORPORATED TERRITORY OR IN CONTRACTING CITIES OF LOS ANGELES COUNTY.

LICENSE FEE	\$ 175.00	TOTAL	\$ 175.00	DATE OF ISSUE	9/2/2021	DATE OF EXPIRATION	9/2/2022
-------------	-----------	-------	-----------	---------------	----------	--------------------	----------

HUMANE ORGANIZATION
CONDITION/LIMITATION APPLY

SOUTHERN CALIFORNIA CAT ADOPTION
JULIA MILDENBERGER
35762 80TH EAST ST
LITTLE ROCK, CA 93543



COUNTY TAX COLLECTOR
and Ex-officio County License Collector

MARCIA MAYEDA
DIRECTOR OF ANIMAL CONTROL

Facility Inspection grade: A

A4751942

By JAIME PALAFOX

LICENSEE LOCATION — BUSINESS OR TYPE ANIMAL

Rev. A—05/03/10

THIS LICENSE IS NOT TRANSFERABLE

This license must be clearly visible to the general public and to patrons entering the facility
as defined in Los Angeles County Code Title 10 Section 10.28.280

COUNTY LICENSENo. B21-2167CK

COUNTY OF LOS ANGELES -- STATE OF CALIFORNIA

THE LICENSEE NAMED HEREON HAS PAID TO THE UNDERSIGNED TAX COLLECTOR THE AMOUNT SHOWN AND IS HEREBY LICENSED, UNDER PROVISIONS OF TITLE 10, FOR THE PERIOD EXPIRING ON THE DATE SHOWN TO CARRY ON BUSINESS OR OCCUPATION OR MAINTAIN THE ANIMAL SPECIFIED, AT THE LOCATION SHOWN. THIS LICENSE IS SUBJECT TO ANY SPECIAL CONDITIONS SHOWN AND IS VALID ONLY IN THE UNINCORPORATED TERRITORY OR IN CONTRACTING CITIES OF LOS ANGELES COUNTY.

LICENSE FEE	\$ 175.00	TOTAL	\$ 175.00	DATE OF ISSUE	9/2/2021	DATE OF EXPIRATION	9/2/2022
-------------	-----------	-------	-----------	---------------	----------	--------------------	----------

HUMANE ORGANIZATION

CONDITION/LIMITATION APPLY

SOUTHERN CALIFORNIA CAT ADOPTION

JULIA MILDENBERGER

35762 80TH EAST ST

LITTLEROCK, CA 93543

COUNTY TAX COLLECTOR
and Ex-officio County License CollectorMARCIA MAYEDA
DIRECTOR OF ANIMAL CONTROL

Facility Inspection grade: A

A4751940

By JAIME PALAFOX

LICENSEE LOCATION - BUSINESS OR TYPE ANIMAL

Rev. A - 05/03/10

THIS LICENSE IS NOT TRANSFERABLE

DECLARATION OF MARLA TAUSCHER

I, Marla Tauscher, declare under oath:

1. I am an attorney duly licensed and admitted to practice law in the State of California.

2. I am the attorney of record for Petitioner/Plaintiff Julia Mildenerger in the present case, No. 22STCP04242.

3. I have first-hand, personal knowledge of the facts set forth in this declaration, and if called and sworn as a witness, I would testify competently to them.

4. On December 2, 2022, I filed a Verified Petition for Writ of Mandate and Complaint for damages pursuant to 42 U.S.C. §1983 seeking the immediate return of animals seized from Petitioner/Plaintiff by Los Angeles County Department of Animal Control (hereinafter "LADAC") on October 26, 2022 from Petitioner/Plaintiff's residence.

5. On November 2, 2022, I went to the Michael Antonovich Antelope Valley Courthouse (hereinafter "Lancaster Courthouse") to file a *Nonstatutory Motion for Return of Property* in the Criminal Division, but the clerks refused to file the motion because there was no case number because Petitioner/Plaintiff has not been charged with any crimes.

6. I filed such a motion in the criminal division of the Central Courthouse in San Bernardino County, under similar circumstances, on April 26, 2022 which was assigned a temporary case number and set for a hearing.

7. On November 4, 2022, Petitioner/Plaintiff filed a *Petition for Writ of Mandate and Complaint pursuant to 42 U.S.C. §1983*.

8. When I realized that there was an error in the filing, I contacted Lancaster Court on November 7, 2022 to request the filing be rejected.

9. I re-submitted the *Petition and Complaint* with the Lancaster Court on November 7, 2022. The Lancaster Court waited three (3) weeks to reject the filing, on the basis that

DECLARATION OF MARLA TAUSCHER ISO
EX PARTE APPLICATION FOR TRO

1 10. *Three weeks later*, on November 28, 2022, I received notice from Lancaster
2 Courthouse that the filing was rejected because 2 of the documents were not text searchable.
3 Attached hereto as Exhibit 1 is a true and correct copy of the notice from Lancaster Courthouse.

4 11. I converted the documents to text searchable documents and re-submitted them
5 on the same day, November 28, 2022.

6 12. On December 1, 2022, I again was notified by clerks at Lancaster Courthouse that
7 the filing was rejected, that time citing incorrect court district/location, among other things.
8 Attached hereto as Exhibit 2 is a true and correct copy of the notice from Lancaster Courthouse.

9 13. On December 1, 2022, I corrected the filings and re-submitted them to the Stanley
10 Mosk Courthouse which accepted the filings within approximately two (2) hours of submission.

11 14. On December 6, 2022, the Petitioner/Plaintiff served Respondent/Defendant
12 County of Los Angeles by personal service on the clerk of the board of supervisors with a
13 Summons, Verified Petition for Writ of Mandate and Complaint, Request for Judicial Notice,
14 Civil Case Cover Sheet, and other case commencement documents.

15 15. On December 7, 2022, at 8:36 a.m., I telephoned David Beaudet, deputy county
16 counsel for the County of Los Angeles at his office number: (213) 974-1929, the telephone
17 number on his outgoing emails to notify him of my intent to appear *ex parte* in Dept. 85 of
18 Stanley Mosk Courthouse on December 8, 2022 at 8:30 a.m. seeking the return of animals to
19 Julia Mildenberger.

20 16. On December 7, 2022, at 9:03 a.m. I transmitted to Mr. Beaudet an email notice
21 of my intent to appear *ex parte* for an application for a temporary restraining order with copies
22 of the *Ex Parte* Application for a Temporary Restraining Order and Proposed Order.

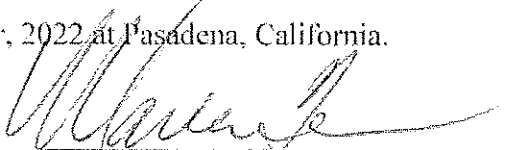
23 17. In both my voicemail and email messages, I requested that Mr. Beaudet inform
24 me as to whether someone intends to appear on Thursday, December 8, 2022 at 8:30 a.m. in
25 Department 85 of the Stanley Mosk Courthouse to oppose the *Ex Parte* Application for TRO.

26
27
28
DECLARATION OF MARLA TAUSCHER ISO
EX PARTE APPLICATION FOR TRO

1 18. I received an email from Mr. Beaudet at 9:20 a.m. informing me that he had
2 forwarded the notice of ex parte hearing to his colleagues, Armita Radjabian and Jill Williams.
3 but did not indicate whether he, or anyone else, intends to appear on December 8, 2022 to oppose
4 Petitioner's ex parte application for a TRO.

5
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct.

8
9
10 Executed this 7th day of December, 2022 at Pasadena, California.

11 
12 Marla Tauscher
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28
DECLARATION OF MARLA TAUSCHER ISO
EX PARTE APPLICATION FOR TRO

EXHIBIT 1

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES Branch Name: Michael Antonovich Antelope Valley Courthouse Mailing Address: City, State and Zip Code:	
SHORT TITLE: JULIA MILDENBERGER vs COUNTY OF LOS ANGELES NOTICE OF COURT REJECTION OF ELECTRONIC FILING	CASE NUMBER:

The electronic filing described by the summary data below was reviewed and rejected by the Superior Court of California, County of LOS ANGELES.

E-Filing Summary Data

Electronically Submitted By: Green Filing
Transaction Number: 22LA01408918
Court received Date: 11/07/2022
Court received Time: 2:50 pm
Notice Generated Date: 11/28/2022
Notice Generated Time: 8:31 am

Documents Electronically Rejected

Petition (name extension)
Civil Case Cover Sheet
Civil Case Cover Sheet
Request (name extension)
Ex Parte Application (name extension)

This electronic filing was rejected based on the following reason(s)

Reject Reason Other: The Petition PDF is non searchable. Please resubmit in a searchable PDF. Thanks

EXHIBIT 2

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES Branch Name: Michael Antonovich Antelope Valley Courthouse Mailing Address: City, State and Zip Code:	
SHORT TITLE: JULIA MILDENBERGER vs COUNTY OF LOS ANGELES NOTICE OF COURT REJECTION OF ELECTRONIC FILING	CASE NUMBER:

The electronic filing described by the summary data below was reviewed and rejected by the Superior Court of California, County of LOS ANGELES.

E-Filing Summary Data

Electronically Submitted By: Green Filing
Transaction Number: 22LA01498310
Court received Date: 11/28/2022
Court received Time: 12:56 pm
Notice Generated Date: 12/01/2022
Notice Generated Time: 9:04 am

Documents Electronically Rejected

Petition (name extension)
Civil Case Cover Sheet
Civil Case Cover Sheet
Request (name extension)
Ex Parte Application (name extension)
Summons

This electronic filing was rejected based on the following reason(s)

Reject Reason: Incorrect case category and/or case type selected.

Reject Reason: Incorrect Court District/Court Location.

Reject Reason: Incorrect filing code selected.

Reject Reason Other: CM-010 and LASC CIV 109 must be submitted together. Ex Parte document must be submitted after case number is obtained. Make sure that case type conforms to case information screen, CM-010, & LASC CIV 109.